

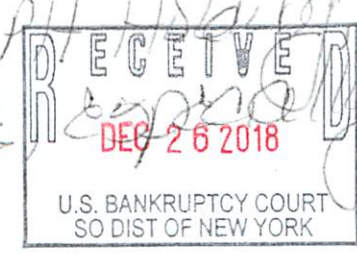
December 20, 2018
July 3, 2018
SP

Honorable Robert E. Aschert
United States Bankruptcy Court Southern District of
New York, Eastern District of New York
New York, New York 10004

1 of 1

Dear Honorable Robert E. Aschert

I Sheryl J. Carter, reside at 2420 Bay
view Lane, Niagara Falls, New York 14301.
My phone number is (716) 475-9749.
I respectfully request all my information, documents
in this claim enclosed against Belphi
Holdings Corp et al, and their affiliates Belphi
in these dockets, claim all of my claims
as not paid to me at all. I have not
received any funds from BPH Holding Corp,
and their affiliates Belphi or any of my claims
yet. If they were honored I Sheryl J. Carter
respectfully in previous documents requested all
my documents, records that BPH Holding and
their affiliates have on me.



800 page deposition that my previous
attorney Geoffrey Barker from Cincinnati Ohio
mailed to your court. That was an 7th
deposition and I stayed 2. Later paid
800.00 costs for it to my then attorney
to start this case in Dayton Ohio.

I know this case is years old, but I
stayed 2. Later read in the massive
report book document that BPH Holding
and their affiliates debts had 10 years
to pay everyone involved. I have not receive
any payment from BPH Holding and affiliates
at all. There is tax claims that I
think were broken down from all those
debits that they BPH Holding and their
affiliates debts tried to pick up

Enclosed is a money order of \$30.00
I believe I was told to pick up my
claim to give me any information all those
claims, debts that I have in your court.
Thank you.

Tracy Carter

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Debtors and Debtors-in-Possession

Delphi Legal Information Hotline:
Toll Free: (800) 718-5305
International: (248) 813-2698

Delphi Legal Information Website:
<http://www.delphidocket.com>

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	
In re	:	Chapter 11
	:	
DELPHI CORPORATION, <u>et al.</u> ,	:	Case No. 05-44481 (RDD)
	:	
	:	(Jointly Administered)
Debtors.	:	
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EX PARTE APPLICATION UNDER 11 U.S.C. § 107(b)
AND FED. R. BANKR. P. 9018 FOR ORDER AUTHORIZING
DEBTORS TO FILE CERTAIN EXHIBITS AND SCHEDULES
TO MASTER DISPOSITION AGREEMENT WITH GM
COMPONENTS HOLDINGS, LLC, GENERAL MOTORS
CORPORATION, AND PARNASSUS HOLDINGS II, LLC UNDER SEAL

("MDA SEALING APPLICATION")

On June 1, 2009, Delphi Corporation ("Delphi") and certain of its subsidiaries and affiliates, debtors and debtors-in-possession in the above-captioned cases (collectively, the

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Reorganized Debtors

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International: (248) 813-2698

DPH Holdings Corp. Legal Information Website:
<http://www.dphholdingsdocket.com>

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	
In re	:	Chapter 11
	:	
DPH HOLDINGS CORP., <u>et al.</u> ,	:	Case No. 05-44481 (RDD)
	:	
Reorganized Debtors.	:	(Jointly Administered)
	:	
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NOTICE OF ADJOURNMENT OF CLAIMS OBJECTION HEARING WITH
RESPECT TO REORGANIZED DEBTORS' OBJECTION TO PROOF
OF CLAIM NUMBER 16850 FILED BY SHARYL Y. CARTER

("NOTICE OF ADJOURNMENT AS TO SHARYL Y. CARTER'S
PROOF OF CLAIM NUMBER 16850")

Debtors and making distributions (if any) with respect to all Claims and Interests" Modified Plan, art. 9.6.

PLEASE TAKE FURTHER NOTICE that on November 18, 2009, the Reorganized Debtors filed the Notice Of Sufficiency Hearing With Respect To Debtors' Objection To Proofs Of Claim Nos. 1374, 1375, 1376, 1377, 1378, 1379, 1380, 1381, 1382, 1383, 1384, 1385, 1386, 1387, 2539, 3175, 5408, 6468, 6668, 7269, 9396, 10570, 10571, 10835, 10836, 10964, 10965, 10966, 10967, 10968, 12251, 13464, 13663, 13699, 13730, 13734, 13863, 13875, 14334, 14350, 14751, 15071, 15075, 15513, 15515, 15519, 15520, 15521, 15524, 15525, 15532, 15584, 15586, 15587, 15588, 15590, 15591, 15592, 15593, 15594, 15595, 16175, 16591, 16849, And 16850 (Docket No. 19108) (the "Sufficiency Hearing Notice") scheduling a sufficiency hearing (the "Sufficiency Hearing") for December 18, 2009, at 10:00 a.m. (prevailing Eastern time) in the United States Bankruptcy Court for the Southern District of New York, 300 Quarropas Street, Room 118, White Plains, New York 10601-4140 to address the legal sufficiency of each Proof of Claim and whether each Proof of Claim states a colorable claim against the asserted Debtor.

PLEASE TAKE FURTHER NOTICE that pursuant to paragraph 9(a)(ii) of the Order Pursuant To 11 U.S.C. § 502(b) And Fed. R. Bankr. P. 2002(m), 3007, 7016, 7026, 9006, 9007, And 9014 Establishing (i) Dates For Hearings Regarding Objections To Claims And (ii) Certain Notices And Procedures Governing Objections To Claims, entered December 7, 2006 (Docket No. 6089) (the "Claims Objection Procedures Order"), the Sufficiency Hearing with respect to proof of claim number 16850 is hereby adjourned to January 21, 2010.

PLEASE TAKE FURTHER NOTICE that the Sufficiency Hearing will proceed in accordance with the procedures provided in the Claims Objection Procedures Order unless

Fully Unliquidated Claims Reserve

Exhibit F - Executory Contracts Claims

Motors Liquidation Company
Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Reserve Type	Objection Status
CLARK STREET REDEVELOPMENT ONE LLC ATTN: KATHLEEN H KLAUS ESQ MADDIN HAUSER WARTELL ROTH & HELLER PC 28400 NORTHWESTERN HIGHWAY 3RD FL SOUTHFIELD, MI 48034	58638	Motors Liquidation Company	Fully Unliquidated claims	Remaining Claim
CLARK STREET REDEVELOPMENT SIX LLC KATHLEEN H KLAUS ESQ MADDIN HAUSER WARTELL ROTH & HELLER P C 28400 NORTHWESTERN HIGHWAY 3RD FLOOR SOUTHFIELD, MI 48034	58642	Motors Liquidation Company	Fully Unliquidated claims	Remaining Claim
CLARK STREET REDEVELOPMENT THREE LLC ATTN: KATHLEEN H KLAUS ESQ MADDIN HAUSER WARTELL ROTH & HELLER PC 28400 NORTHWESTERN HIGHWAY 3RD FL SOUTHFIELD, MI 48034	58640	Motors Liquidation Company	Fully Unliquidated claims	Remaining Claim
CLARK STREET REDEVELOPMENT FOUR LLC ATTN: KATHLEEN H KLAUS ESQ MADDIN HAUSER WARTELL ROTH & HELLER PC 28400 NORTHWESTERN HIGHWAY 3RD FL SOUTHFIELD, MI 48034	58647	Motors Liquidation Company	Fully Unliquidated claims	Remaining Claim
CLARK STREET TECHNOLOGY PARK KATHLEEN H KLAUS ESQ MADDIN HAUSER WARTELL ROTH & HELLER, P C 28400 NORTHWESTERN HIGHWAY 3RD FLOOR SOUTHFIELD, MI 48034	58643	Motors Liquidation Company	Fully Unliquidated claims	Remaining Claim
COMERICA LEASING CORPORATION BODMAN LLP C O COLIN T DARKE ESQ 1901 ST ANTOINE STREET 6TH FLR AT FORD FIELD DETROIT, MI 48226	64630	Motors Liquidation Company	Fully Unliquidated claims	Remaining Claim
DPH HOLDINGS CORP AND ITS SUBSIDIARIES AND AFFILIATES C O DPH HOLDINGS CORP ATTN: JOHN BROOKS 5725 DELPHI DRIVE TROY, MI 48098 UNITED STATES OF AMERICA	67324	Motors Liquidation Company	Fully Unliquidated claims	Remaining Claim

(1) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

"Debtors"), filed the (A) Supplement To Motion For Order (I) Approving Modifications To Debtors' First Amended Plan Of Reorganization (As Modified) And Related Disclosures And Voting Procedures And (II) Setting Final Hearing Date To Consider Modifications To Confirmed First Amended Plan Of Reorganization And (B) Request To Set Administrative Expense Claims Bar Date And Alternative Sale Hearing Date (Docket No. 16646) (the "Modification Procedures Motion"). Attached as Exhibit 1-A-1 to the Motion were exhibits to the Debtors' First Amended Joint Plan Of Reorganization Of Delphi Corporation And Certain Affiliates, Debtors And Debtors-In-Possession (As Modified) (the "Modified Plan"), including the Master Disposition Agreement (the "MDA"). By this ex parte application (the "Application"), the Debtors seek limited relief to protect certain sensitive information. Specifically, the Debtors seek authority to file under seal certain exhibits and schedules to the MDA with GM Components Holdings, LLC, General Motors Corporation, And Parnassus Holdings II, LLC (the "Buyers," and together with the Debtors, the "Parties"), and certain agreements which are ancillary to the MDA. The exhibits, schedules, and ancillary agreements proposed to be filed under seal are identified on Attachment 1 to the proposed order submitted herewith (collectively the "Exhibits and Schedules").¹ In furtherance of the relief being sought, the Debtors respectfully represent as follows:

Background

A. The Chapter 11 Filings

1. On October 8 and 14, 2005, Delphi and certain of its U.S. subsidiaries and affiliates filed voluntary petitions in this Court for reorganization relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101-1330, as then amended (the "Bankruptcy Code").

¹ Certain exhibits and schedules to the MDA have not yet been completed. When those exhibits and schedules have been completed, the Debtors anticipate seeking authority motion to file certain of those exhibits and schedules under seal by separate ex parte motion.

Hearing Date: July 23, 2009
Hearing Time: 10:00 a.m. (prevailing Eastern time)

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- and -

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Debtors and Debtors-in-Possession

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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	
In re	:	Chapter 11
	:	
DELPHI CORPORATION, <u>et al.</u> ,	:	Case No. 05-44481 (RDD)
	:	
Debtors.	:	(Jointly Administered)
	:	
-----	x	

DEBTORS' OMNIBUS REPLY IN SUPPORT OF THIRTY-FOURTH OMNIBUS OBJECTION
PURSUANT TO 11 U.S.C. § 502(b) AND FED. R. BANKR. P. 3007 TO (I) EXPUNGE (A) CERTAIN
PENSION AND OPEB CLAIMS, (B) CERTAIN INDIVIDUAL WORKERS' COMPENSATION CLAIMS,
(C) CERTAIN DUPLICATE AND/OR AMENDED INDIVIDUAL WORKERS' COMPENSATION
CLAIMS, (D) CERTAIN UNTIMELY INDIVIDUAL WORKERS' COMPENSATION CLAIMS, (E) A
SECURED BOOKS AND RECORDS CLAIM, AND (F) CERTAIN UNTIMELY CLAIMS, (II) MODIFY
CERTAIN (A) WAGE AND BENEFIT CLAIMS, (B) STATE WORKERS' COMPENSATION CLAIMS,
AND (C) INDIVIDUAL WORKERS' COMPENSATION CLAIMS ASSERTING PRIORITY, (III)
PROVISIONALLY DISALLOW CERTAIN UNION CLAIMS, AND (IV) MODIFY AND ALLOW
CERTAIN SETTLED CLAIMS

("DEBTORS' OMNIBUS REPLY IN SUPPORT OF THIRTY-FOURTH
OMNIBUS CLAIMS OBJECTION")

1. NAME
 2. ADDRESS
 3. CITY
 4. STATE
 5. ZIP
 6. PHONE
 7. DATE
 8. SIGNATURE
 9. PRINT NAME
 10. DATE

[illegible]

6.2. *Polymers with higher molecular weights*
 6.2.1. *Polymers with molecular weights*

1. Administrative
 2. Business
 3. Personal
 4. Professional
 5. Religious
 6. Recreational
 7. Travel
 8. Unlabeled
 9. Unknown
 10. Other

[illegible]

UNITED STATES DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION

10-79440

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(b) (5) DPP, (b) (5) ACP

1. The first part of the document is a letter from the President of the United States to the Congress, dated January 1, 1861. It is a formal communication, and it is written in a very formal and dignified style. It is a letter of introduction, and it is written in a very formal and dignified style. It is a letter of introduction, and it is written in a very formal and dignified style.

KTSP-TV (Channel 3) is a PBS member station serving the San Francisco Bay Area. It is owned by PBS and is a member of the National Public Television Association. The station's programming is primarily educational and cultural, and it is known for its high-quality production values. It is a public television station, and its programming is funded by a combination of viewer donations, corporate sponsorships, and government grants. The station's website is www.ktsp.org.

	RESPONSE	PROOF OF CLAIM NOS.	SUMMARY OF RESPONSE	BASIS FOR OBJECTION	TREATMENT ²
9.	Paul Pickles (Docket No. ____)	13464	Paul Pickles disagrees with the Debtors' Objection to disallow and expunge proof of claim no. 13464 and requests that the Bankruptcy Court reconsider its decision with respect to the health and life insurance benefits of the salaried retirees.	Pension and OPEB claim	Adjourn
10.	Jack Hamilton (Docket No. ____)	818	Jack Hamilton disagrees with the Debtors' Objection to disallow and expunge proof of claim no. 818 and requests that the Bankruptcy Court reconsider its decision with respect to the workers' compensation claims.	Individual workers' compensation books and records claims	Adjourn
11.	Sharyl Carter (Docket No. ____)	16849, 16850	Sharyl Carter disagrees with the Debtors' Objection to disallow and expunge proof of claim nos. 16849 and 16850.	Untimely claims	Adjourn



UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	:	
In re	:	Chapter 11
	:	
DELPHI CORPORATION, <u>et al.</u> ,	:	Case No. 05-44481 (RDD)
	:	
Debtors.	:	(Jointly Administered)
	:	
-----X		

ORDER PURSUANT TO 11 U.S.C. § 502(b) AND FED. R. BANKR. P. 3007
TO (I) EXPUNGING (A) CERTAIN PENSION AND OPEB CLAIMS, (B)
CERTAIN INDIVIDUAL WORKERS' COMPENSATION CLAIMS, (C)
CERTAIN DUPLICATE AND/OR AMENDED INDIVIDUAL WORKERS'
COMPENSATION CLAIMS, (D) AN UNTIMELY INDIVIDUAL
WORKERS' COMPENSATION CLAIM, (E) A SECURED BOOKS AND
RECORDS CLAIM, AND (F) CERTAIN UNTIMELY CLAIMS, (II)
MODIFYING CERTAIN (A) WAGE AND BENEFIT CLAIMS, (B) STATE
WORKERS' COMPENSATION CLAIMS, AND (C) INDIVIDUAL
WORKERS' COMPENSATION CLAIMS ASSERTING PRIORITY, (III)
PROVISIONALLY DISALLOWING CERTAIN UNION CLAIMS, AND (IV)
MODIFYING AND ALLOWING CERTAIN SETTLED CLAIMS
IDENTIFIED IN THE THIRTY-FOURTH OMNIBUS CLAIMS
OBJECTION

("THIRTY-FOURTH OMNIBUS CLAIMS OBJECTION ORDER")

Upon the Debtors' Thirty-Fourth Omnibus Objection Pursuant To 11 U.S.C. §
502(b) And Fed. R. Bankr. P. 3007 To (I) Expunge (A) Certain Pension And OPEB Claims, (B)
Certain Individual Workers' Compensation Claims, (C) Certain Duplicate And/Or Amended
Individual Workers' Compensation Claims, (D) Certain Untimely Individual Workers'
Compensation Claims, (E) A Secured Books And Records Claim, And (F) Certain Untimely
Claims, (II) Modify Certain (A) Wage And Benefit Claims, (B) State Workers' Compensation
Claims, And (C) Individual Workers' Compensation Claims Asserting Priority, (III)

EXHIBIT F-3 - ADJOURNED STATE WORKERS' COMPENSATION CLAIMS SUBJECT TO MODIFICATION

CLAIM TO BE MODIFIED	CLAIM AS DOCKETED*	CLAIM AS MODIFIED
<p>Claim: 11631 Date Filed: 07/27/2006 Docketed Total: \$0.00 Filing Creditor Name: NEW JERSEY SELF INSURERS GUARANTY ASSOCIATION MCELROY DEUTSCH MULVANEY & CARPENTER LLP THREE GATEWAY CTR 100 MULBERRY ST NEWARK, NJ 07102-4079</p>	<p>Claim Holder Name NEW JERSEY SELF INSURERS GUARANTY ASSOCIATION MCELROY DEUTSCH MULVANEY & CARPENTER LLP THREE GATEWAY CTR 100 MULBERRY ST NEWARK, NJ 07102-4079</p> <p>Docketed Total: UNL</p> <p>Case Number** Secured Priority Unsecured 05-44481 _____ _____ _____ UNL _____ _____ _____ UNL</p>	<p>Modified Total: \$0.00</p> <p>Case Number** Secured Priority Unsecured 05-44481 _____ _____ _____ \$0.00 _____ _____ _____ \$0.00</p>
<p>Claim: 1291 Date Filed: 12/27/2005 Docketed Total: \$24,732,628.02 Filing Creditor Name: OHIO BUREAU OF WORKERS COMPENSATION 30 W SPRING ST PO BOX 15567 COLUMBUS, OH 43215-0567</p>	<p>Claim Holder Name OHIO BUREAU OF WORKERS COMPENSATION 30 W SPRING ST PO BOX 15567 COLUMBUS, OH 43215-0567</p> <p>Docketed Total: \$24,732,628.02</p> <p>Case Number** Secured Priority Unsecured 05-44481 _____ \$24,732,628.02 _____ \$24,732,628.02</p>	<p>Modified Total: \$24,732,628.02</p> <p>Case Number** Secured Priority Unsecured 05-44481 _____ \$24,732,628.02 _____ \$24,732,628.02</p>
<p>Claim: 1301 Date Filed: 12/27/2005 Docketed Total: \$39,610,402.53 Filing Creditor Name: OHIO BUREAU OF WORKERS COMPENSATION 30 W SPRING ST PO BOX 15567 COLUMBUS, OH 43215-0567</p>	<p>Claim Holder Name OHIO BUREAU OF WORKERS COMPENSATION 30 W SPRING ST PO BOX 15567 COLUMBUS, OH 43215-0567</p> <p>Docketed Total: \$39,610,402.53</p> <p>Case Number** Secured Priority Unsecured 05-44481 _____ \$39,610,402.53 _____ \$39,610,402.53</p>	<p>Modified Total: \$39,610,402.53</p> <p>Case Number** Secured Priority Unsecured 05-44481 _____ \$39,610,402.53 _____ \$39,610,402.53</p>

* "UNL" denotes an unliquidated claim.

** See Exhibit G for a listing of debtor entities by case number.

re Delphi Corporation, et al.

Thirty-Fourth Omnibus Claims Objection

Case No. 05-44481 (RDD)

EXHIBIT F-6 - ADJOURNED UNTIMELY CLAIMS

CREDITOR'S NAME *	CLAIM NUMBER	ASSERTED CLAIM AMOUNT **	DATE FILED	DOCKETED DEBTOR
SHARYL YVETTE CARTER	16849	Secured: \$50,000,000.00 Priority: UNL Administrative: Unsecured: UNL Total: \$50,000,000.00	05/01/2009	DELPHI AUTOMOTIVE SYSTEMS LLC (05-44640)
SHARYL YVETTE CARTER	16850	Secured: \$50,000,000.00 Priority: UNL Administrative: Unsecured: UNL Total: \$50,000,000.00	04/28/2009	DELPHI AUTOMOTIVE SYSTEMS LLC (05-44640)
Total:		2	\$100,000,000.00	

The address of the creditor on this exhibit has been intentionally omitted for privacy reasons.

UNL" denotes an unliquidated claim.

Exhibit	Claim	Claim Holder
EXHIBIT C-2 - INDIVIDUAL WORKERS' COMPENSATION CLAIMS SUBJECT TO MODIFICATION	9142	SCHADE RICHARD A
EXHIBIT C-1 - INDIVIDUAL WORKERS' COMPENSATION BOOKS AND RECORDS CLAIMS	7809	SCHMIDT GARY
EXHIBIT A - PENSION AND OPEB CLAIMS	10164	SCHMIDT THOMAS A
EXHIBIT E - CLAIMS ALLOWED PURSUANT TO SETTLEMENT	11284	SCHMIEDENEGHT GREGORY
EXHIBIT F-6 - ADJOURNED UNTIMELY CLAIMS	16849	SCHRADER BRIDGEPORT INTL INC
EXHIBIT F-6 - ADJOURNED UNTIMELY CLAIMS	16850	SHARLY VETTE CARTER
EXHIBIT C-1 - INDIVIDUAL WORKERS' COMPENSATION BOOKS AND RECORDS CLAIMS	4871	SHARLY VETTE CARTER
EXHIBIT C-1 - INDIVIDUAL WORKERS' COMPENSATION BOOKS AND RECORDS CLAIMS	544	SHAW LAVERNE
EXHIBIT A - PENSION AND OPEB CLAIMS	13518	SHAY RHONDA J
EXHIBIT E - CLAIMS ALLOWED PURSUANT TO MODIFICATION	1472	SHEPHERD JEFFREY C
EXHIBIT C-2 - INDIVIDUAL WORKERS' COMPENSATION CLAIMS SUBJECT TO MODIFICATION	14057	SHERWIN WILLIAMS COMPANY
EXHIBIT B - WAGE AND BENEFIT CLAIMS SUBJECT TO MODIFICATION	14930	SHORT JOANNE
EXHIBIT E - CLAIMS ALLOWED PURSUANT TO SETTLEMENT	2571	SHOWERS TEE
EXHIBIT C-1 - INDIVIDUAL WORKERS' COMPENSATION BOOKS AND RECORDS CLAIMS	13101	SIEMENS AG
EXHIBIT C-1 - INDIVIDUAL WORKERS' COMPENSATION BOOKS AND RECORDS CLAIMS	10470	SIEMENS BARBARA
EXHIBIT C-2 - INDIVIDUAL WORKERS' COMPENSATION CLAIMS SUBJECT TO MODIFICATION	8917	SIKORSKI RAE
EXHIBIT C-1 - INDIVIDUAL WORKERS' COMPENSATION BOOKS AND RECORDS CLAIMS	5068	SIMMONS DORIS R
EXHIBIT C-2 - INDIVIDUAL WORKERS' COMPENSATION CLAIMS SUBJECT TO MODIFICATION	8335	SIMMONS DONALD L
EXHIBIT C-1 - INDIVIDUAL WORKERS' COMPENSATION BOOKS AND RECORDS CLAIMS	15031	SIMS MEMORI
EXHIBIT E - CLAIMS ALLOWED PURSUANT TO SETTLEMENT	11274	SLOVAK KARIN R
EXHIBIT C-1 - INDIVIDUAL WORKERS' COMPENSATION BOOKS AND RECORDS CLAIMS	13100	SMALL PARTS INC
EXHIBIT B - WAGE AND BENEFIT CLAIMS SUBJECT TO MODIFICATION	15719	SMALLEY EDNA
EXHIBIT C-3 - INDIVIDUAL WORKERS' COMPENSATION BOOKS AND RECORDS CLAIMS	4927	SMITH JR RICHARD L
EXHIBIT C-1 - INDIVIDUAL WORKERS' COMPENSATION BOOKS AND RECORDS CLAIMS	5150	SMITH MICHAEL
EXHIBIT A - PENSION AND OPEB CLAIMS	9241	SMITH MICHAEL W
EXHIBIT C-1 - INDIVIDUAL WORKERS' COMPENSATION CLAIMS SUBJECT TO MODIFICATION	11334	SMITH ROBERT M
EXHIBIT C-2 - INDIVIDUAL WORKERS' COMPENSATION CLAIMS SUBJECT TO MODIFICATION	7173	SMITHS MARY L
EXHIBIT C-1 - INDIVIDUAL WORKERS' COMPENSATION BOOKS AND RECORDS CLAIMS	13099	SNOOK TERRENCE L
EXHIBIT E - CLAIMS ALLOWED PURSUANT TO SETTLEMENT	11646	SOBH RAIDAN
EXHIBIT C-2 - INDIVIDUAL WORKERS' COMPENSATION CLAIMS SUBJECT TO MODIFICATION	6874	SPOC GROUP LLC AS AGENT FOR SILVER POINT CAPITAL FUND LP AND SILVER POINT CAPITAL OFFSHORE FUND LTD
EXHIBIT A - PENSION AND OPEB CLAIMS	16100	SPEAR MICHAEL K
EXHIBIT A - PENSION AND OPEB CLAIMS	16099	SPENCER ROBERT
EXHIBIT C-1 - INDIVIDUAL WORKERS' COMPENSATION BOOKS AND RECORDS CLAIMS	7146	SPENCER ROBERT L
EXHIBIT C-3 - INDIVIDUAL WORKERS' COMPENSATION BOOKS AND RECORDS CLAIMS	14782	SPRONZ JACK
EXHIBIT C-1 - INDIVIDUAL WORKERS' COMPENSATION BOOKS AND RECORDS CLAIMS	14783	STERLING CALVIN B
EXHIBIT C-1 - INDIVIDUAL WORKERS' COMPENSATION BOOKS AND RECORDS CLAIMS	13449	STERLING CALVIN B
EXHIBIT C-1 - INDIVIDUAL WORKERS' COMPENSATION BOOKS AND RECORDS CLAIMS	14928	STILSON NICHOLAS
EXHIBIT C-1 - INDIVIDUAL WORKERS' COMPENSATION BOOKS AND RECORDS CLAIMS	8644	STINE DANIEL
EXHIBIT C-3 - INDIVIDUAL WORKERS' COMPENSATION CLAIMS SUBJECT TO MODIFICATION	8646	STINE DAVID
EXHIBIT C-2 - INDIVIDUAL WORKERS' COMPENSATION CLAIMS SUBJECT TO MODIFICATION	9618	STINE DAVID
EXHIBIT C-3 - INDIVIDUAL WORKERS' COMPENSATION BOOKS AND RECORDS CLAIMS	16125	STRAHM JR CHARLES F
EXHIBIT C-1 - INDIVIDUAL WORKERS' COMPENSATION DUPLICATE AND AMENDED CLAIMS	16257	STRAIGHT MARY
EXHIBIT C-3 - INDIVIDUAL WORKERS' COMPENSATION DUPLICATE AND AMENDED CLAIMS	12248	STRAIGHT MARY
EXHIBIT C-2 - INDIVIDUAL WORKERS' COMPENSATION CLAIMS SUBJECT TO MODIFICATION	8337	STREETEER STEVEN D
EXHIBIT C-2 - INDIVIDUAL WORKERS' COMPENSATION CLAIMS SUBJECT TO MODIFICATION	9293	STUDIVENT LUTHA M
EXHIBIT C-1 - INDIVIDUAL WORKERS' COMPENSATION BOOKS AND RECORDS CLAIMS	10459	STUPAK SUSAN E
EXHIBIT C-1 - INDIVIDUAL WORKERS' COMPENSATION BOOKS AND RECORDS CLAIMS	7489	SUFFOLETTA GARY
EXHIBIT A - PENSION AND OPEB CLAIMS	15198	SWAN SUSAN K
EXHIBIT A - PENSION AND OPEB CLAIMS	15198	SWEET RICHARD R

Exhibit H - Claimants And Related Claims Subject To Thirty-Fourth Omnibus Claims Objection
Case No. 05-44481 (RDD)
In re: Delphi Corporation, et al.

PRF 26722-3

Hearing Date: March 18, 2010

Hearing Time: 10:00 a.m. (prevailing Eastern time)

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Chicago, Illinois 60606
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John K. Lyons
Ron E. Meisler

- and -

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Kayalyn A. Marafioti

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Reorganized Debtors

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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	
In re	:	Chapter 11
	:	
DPH HOLDINGS CORP., <u>et al.</u> ,	:	Case No. 05-44481 (RDD)
	:	
	:	(Jointly Administered)
Reorganized Debtors.	:	
-----	-	x

REORGANIZED DEBTORS' OMNIBUS REPLY IN SUPPORT OF FORTY-FIFTH OMNIBUS
OBJECTION PURSUANT TO 11 U.S.C. § 503(b) AND FED. R. BANKR. P. 3007 TO (I)
EXPUNGE CERTAIN ADMINISTRATIVE EXPENSE (A) SEVERANCE CLAIMS, (B) BOOKS
AND RECORDS CLAIMS, (C) DUPLICATE CLAIMS, (D) PENSION AND BENEFIT CLAIMS,
AND (E) TRANSFERRED WORKERS' COMPENSATION CLAIMS, (II) MODIFY AND
ALLOW CERTAIN ADMINISTRATIVE EXPENSE SEVERANCE CLAIMS, AND (III) ALLOW
CERTAIN ADMINISTRATIVE EXPENSE SEVERANCE CLAIMS

("REORGANIZED DEBTORS' OMNIBUS REPLY IN SUPPORT OF
FORTY-FIFTH OMNIBUS CLAIMS OBJECTION")

Exhibit A

In re DPH Holdings Corp., et al., Case No. 05-44481 (RDD)

*Responses To The Reorganized Debtors' Forty-Fifth Omnibus Claims Objection (the "Objection")
Organized By Respondent¹*

	RESPONSE	PROOF OF CLAIM NOS.	SUMMARY OF RESPONSE	BASIS FOR OBJECTION	TREATMENT ²
1.	Scott M. Leach (Docket No. 19577)	17165	Scott M. Leach disagrees with the Reorganized Debtors' Objection to allow proof of administrative expense claim no. 17165 and files his response out of an abundance of caution.	Allowed Severance Claims	Adjourn
2.	Sharyl Y. Carter (Docket No. 19599)	17094, 17773	Sharyl Y. Carter disagrees with the Reorganized Debtors' Objection to disallow and expunge proofs of administrative expense claim nos. 17094 and 17773.	Books and Records Claims	Adjourn
3.	Shanghai Inteva Automotive Door Systems Company, Ltd. (Docket No. 19627)	19994	Shanghai Inteva Automotive Door Systems Company, Ltd., f/k/a Shanghai Delphi Automotive Door Systems ("SDADS") disagrees with the Reorganized Debtors' Objection to disallow and expunge proof of administrative expense no. 19994. SDADS asserts that its timely filed claim serves as <u>prima facie</u> evidence of the validity and amount of the claim.	Books And Records Claims	Adjourn
4.	Randy D. Austin (Docket No. 19651)	17330	Randy D. Austin disagrees with the Reorganized Debtors' Objection to disallow and expunge proof of administrative expense claim no. 17330.	Severance Claims	Adjourn
5.	JPMorgan Chase Bank, N.A. (Docket	18616	JPMorgan Chase Bank, N.A. ("JPMorgan") disagrees with the Reorganized Debtors'	Books And Records Claims	Adjourn

¹ This chart reflects all Responses received by the Reorganized Debtors as of March 16, 2010 at 5:00 p.m. (prevailing Eastern time).

² This chart reflects all resolutions or proposals as of March 16, 2010 at 5:00 p.m. (prevailing Eastern time).

In re DPH Holdings Corp., et al.
Case No. 05-44481 (RDD)

Forty-Fifth Omnibus Claims Objection

EXHIBIT B - BOOKS AND RECORDS CLAIMS

CREDITOR'S NAME AND ADDRESS*	CLAIM NUMBER	ASSERTED CLAIM AMOUNT**	DATE FILED	DOCKETED DEBTOR
DAVID W FERCANA	17208	Secured: Priority: Administrative: \$776.95 Unsecured: Total: \$776.95	07/02/2009	DELPHI CORPORATION (05-44481)
GOLDMAN SACHS & CO ATTN MICHAEL KEATS 1 NEW YORK PLAZA NEW YORK, NY 10004	19061	Secured: Priority: Administrative: \$888,409.88 Unsecured: Total: \$888,409.88	07/15/2009	DELPHI CORPORATION (05-44481)
HARBINGER DEL AUTO INVESTMENT COMPANY LTD C O BENJAMIN MINTZ KAYE SCHOLER LLP 425 PARK AVE NEW YORK, NY 10022	18963	Secured: Priority: Administrative: UNL Unsecured: Total: UNL	07/15/2009	DELPHI CORPORATION (05-44481)
JP MORGAN CHASE BANK NA ATTN SUSAN E ATKINS MANAGING DIRECTOR 277 PARK AVENUE 8TH FL NEW YORK, NY 10172	18654	Secured: Priority: Administrative: UNL Unsecured: Total: UNL	07/14/2009	DELPHI CORPORATION (05-44481)
MERRILL LYNCH PIERCE FENNER & SMITH INCORPORATED C O MARC FALCONE PAUL WEISS RIFKIND WHARTON & GARRISON LLP 1285 AVE OF THE AMERICAS NEW YORK, NY 10019-6064	18883	Secured: Priority: Administrative: \$7,157,818.25 Unsecured: Total: \$7,157,818.25	07/15/2009	DELPHI CORPORATION (05-44481)
MERRILL LYNCH PIERCE FENNER & SMITH INCORPORATED C O MARC FALCONE PAUL WEISS RIFKIND WHARTON & GARRISON LLP 1285 AVENUE OF THE AMERICAS NEW YORK, NY 10019-6064	19110	Secured: Priority: Administrative: UNL Unsecured: Total: UNL	07/15/2009	DELPHI CORPORATION (05-44481)
X OHIO DEPT OF JOB & FAMILY SERVICES OP REPAYMENT LOCKBOX PO BOX 182059 COLUMBUS, OH 43218	17048	Secured: Priority: Administrative: \$7,488.00 Unsecured: Total: \$7,488.00	06/29/2009	DELPHI CORPORATION (05-44481)
WALTER A KUNKA	19808	Secured: Priority: Administrative: \$2,706.91 Unsecured: Total: \$2,706.91	11/05/2009	DELPHI CORPORATION (05-44481)

* The addresses of certain creditors on this exhibit have been intentionally omitted for privacy reasons.
** "UNL" denotes an unliquidated claim.

In re DPH Holdings Corp., et al.
Case No. 05-44481 (RDD)

Forty-Fifth Omnibus Claims Objection

EXHIBIT 12 - ADJOURNED BOOKS AND RECORDS CLAIMS

DEBTOR'S NAME AND ADDRESS	CLAIM NUMBER	ASSERTED CLAIM AMOUNT*	DATE FILED	DOCKETED DEBTOR
JPM CHASE BANK NA C/O WATKINS MANAGING DIR 277 NE 10172	18616	Secured: Priority: Administrative: \$60,062,043.77 Unsecured: Total: \$60,062,043.77	07/14/2009	DELPHI CORPORATION (05-44481)
SI A: C: D: E: 3: C:	19994	Secured: Priority: Administrative: \$238,274.80 Unsecured: Total: \$238,274.80	11/05/2009	DELPHI CORPORATION (05-44481)
SI E: AVE NO 1 N	17773	Secured: Priority: Administrative: UNL Unsecured: Total: UNL	07/07/2009	DELPHI CORPORATION (05-44481)
SI E: AVE NO 1 N	17094	Secured: Priority: Administrative: \$50,000,000.00 Unsecured: Total: \$50,000,000.00	07/01/2009	DELPHI CORPORATION (05-44481)
Total:		4	\$110,300,318.57	

* UNL denotes an unliquidated claim

Exhibit J - Claimants And Related Claims Subject To Forty-Fifth Omnibus Claims Objection

Claim Holder	Claim	Exhibit
BLANCHE MARIE WILSON NOACK	17197 EXHIBIT A - SEVERANCE CLAIMS	
BRADFORD S WAGNER	20084 EXHIBIT C - DUPLICATE CLAIMS	
BRADFORD S WAGNER	18437 EXHIBIT G - ALLOWED SEVERANCE CLAIMS	
DAVID L VINTON	17100 EXHIBIT E - TRANSFERRED WORKERS' COMPENSATION CLAIMS	
DAVID W FERCAN	17208 EXHIBIT B - BOOKS AND RECORDS CLAIMS	
DENISE C OLBRECHT	20019 EXHIBIT C - DUPLICATE CLAIMS	
DIANE L HOPWOOD	17670 EXHIBIT G - ALLOWED SEVERANCE CLAIMS	
DON MONTGOMERY	17217 EXHIBIT F - MODIFIED AND ALLOWED SEVERANCE CLAIMS	
DONALD L KIDD	18370 EXHIBIT D - PENSION AND BENEFIT CLAIMS	
DORIS FRAZIER	18463 EXHIBIT E - TRANSFERRED WORKERS' COMPENSATION CLAIMS	
GAYLE INSCHO	19899 EXHIBIT C - DUPLICATE CLAIMS	
GOLDMAN SACHS & CO	18061 EXHIBIT B - BOOKS AND RECORDS CLAIMS	
HARBINGER DEL AUTO INVESTMENT COMPANY LTD	18963 EXHIBIT B - BOOKS AND RECORDS CLAIMS	
HORACE CURRY	17043 EXHIBIT D - PENSION AND BENEFIT CLAIMS	
JAMES A LUECKE	18049 EXHIBIT H-3 - ADJOURNED PENSION AND BENEFIT CLAIM	
JAMES R THOMPSON	19818 EXHIBIT C - DUPLICATE CLAIMS	
JAMES T PYTLIK	17020 EXHIBIT A - SEVERANCE CLAIMS	
JIM THOMPSON	17918 EXHIBIT F - MODIFIED AND ALLOWED SEVERANCE CLAIMS	
JIMMY MUELLER	19882 EXHIBIT C - DUPLICATE CLAIMS	
JP MORGAN CHASE BANK NA	18654 EXHIBIT B - BOOKS AND RECORDS CLAIMS	
JP MORGAN CHASE BANK NA	18616 EXHIBIT H-2 - ADJOURNED BOOKS AND RECORDS CLAIMS	
LAURA E MILLER	17073 EXHIBIT G - ALLOWED SEVERANCE CLAIMS	
MARA L HENDRESS	19926 EXHIBIT G - ALLOWED SEVERANCE CLAIMS	
MARCIA JONES	18684 EXHIBIT F - MODIFIED AND ALLOWED SEVERANCE CLAIMS	
MARCIA JONES	20010 EXHIBIT C - DUPLICATE CLAIMS	
MARY REHBEIN	19105 EXHIBIT D - PENSION AND BENEFIT CLAIMS	
MERRILL LYNCH PIERCE FENNER & SMITH INCORPORATED	18883 EXHIBIT B - BOOKS AND RECORDS CLAIMS	
MERRILL LYNCH PIERCE FENNER & SMITH INCORPORATED	19110 EXHIBIT B - BOOKS AND RECORDS CLAIMS	
MICHAEL K UPTIGROVE	17063 EXHIBIT F - MODIFIED AND ALLOWED SEVERANCE CLAIMS	
NATHANIEL WINSTON	20044 EXHIBIT C - DUPLICATE CLAIMS	
OHIO DEPT OF JOB & FAMILY SERVICES	17048 EXHIBIT B - BOOKS AND RECORDS CLAIMS	
RALPH E YOUNG	17768 EXHIBIT G - ALLOWED SEVERANCE CLAIMS	
RANDY D AUSTIN	17330 EXHIBIT H-1 - ADJOURNED SEVERANCE CLAIM	
ROGER K MATHIS	17428 EXHIBIT G - ALLOWED SEVERANCE CLAIMS	
ROHIAL ANDREW PERVEZ	20083 EXHIBIT A - SEVERANCE CLAIMS	
SAMUEL C BLANKENSHIP	18225 EXHIBIT G - ALLOWED SEVERANCE CLAIMS	
SCOTT M LEACH	17165 EXHIBIT H-4 - ADJOURNED ALLOWED SEVERANCE CLAIM	
SDADS SHANGHAI INTEVA AUTOMOTIVE DOOR SYSTEMS COMPANY LTD	19994 EXHIBIT H-2 - ADJOURNED BOOKS AND RECORDS CLAIMS	
SHARYL VETTE CARTER	17094 EXHIBIT H-2 - ADJOURNED BOOKS AND RECORDS CLAIMS	
SHARYL VETTE CARTER	17773 EXHIBIT H-2 - ADJOURNED BOOKS AND RECORDS CLAIMS	
SHIRLEY J MURRY	19183 EXHIBIT D - PENSION AND BENEFIT CLAIMS	
THOMAS L KNOLL	18493 EXHIBIT D - PENSION AND BENEFIT CLAIMS	
THOMAS ROY RILEY	16870 EXHIBIT E - TRANSFERRED WORKERS' COMPENSATION CLAIMS	

Hearing Date: July 29, 2009

Hearing Time: 10:00 a.m. (prevailing Eastern time)

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
155 North Wacker Drive
Chicago, Illinois 60606
(312) 407-0700
John Wm. Butler, Jr.
Albert L. Hogan, III
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- and -

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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In re : Chapter 11
DELPHI CORPORATION, et al., : Case No. 05-44481 (RDD)
Debtors. : (Jointly Administered)
-----X

PROPOSED AGENDA FOR PLAN MODIFICATION HEARING

Location Of Hearing: United States Bankruptcy Court for the Southern District of New York,
Alexander Hamilton Custom House, Room 610, 6th Floor, One
Bowling Green, New York, New York 10004-1408

The matters set for hearing are divided into the following categories for the purposes of this
Proposed Agenda:

- A. Introduction
- B. Contested Matters (1 Matter)
- B. **Contested Matters (1 Matter)**
 - 1. **"Supplement to Plan Modification Approval Motion"** (A) Supplement to Motion for Order (I) Approving Modifications to Debtors' First Amended Plan of Reorganization (as Modified) and Related Disclosures and Voting Procedures and (II) Setting Final Hearing Date to Consider Modifications to Confirmed First Amended Plan of Reorganization and (B) Request to Set Administrative Expense Claims Bar Date and Alternative Sale Hearing Date (Docket No. 16646)

Responses filed: See letter objections listed on Schedules 1 (pension) and 2 (severance) hereto.

Response By Robert Ward (Docket No. 14338)

X Objection By Sheryl Carter (Docket No. 14339)

Liquidity Solutions, Inc.'s Objection To Motion For Order (I) Approving Modifications To Debtors' First Amended Plan Of Reorganization (As Modified) And Related Disclosures And Voting Procedures And (II) Setting Final Hearing Date To Consider Modifications To Confirmed First Amended Plan Of Reorganization (Docket No. 14340)

Statement Of Pension Benefit Guaranty Corporation In Response To Debtors' Supplement To Plan Modification Approval Motion (Docket No. 16893) (The Debtors have reached a settlement with the PBGC)

Objection of Kensington International Limited, Manchester Securities and Springfield Associates, LLC To Debtors' Motion Seeking To Modify Its Plan

(Docket No. 17406) (This objection has been resolved)

X

Pima County's Objection to Debtors' First Amended Joint Plan of Reorganization (as Modified June 16, 2009) (Docket No. 17611) (This objection has been resolved)

Objection of Computer Sciences Corporation to: (I) Confirmation of Debtors' Modified Confirmed Plan; and (II) Debtors Motion for Sale of Substantially All of Their Business Operations (Docket No. 17615) (This objection has been resolved)

Objection of American Aikoku Alpha, Inc. to Notice of Non-Assumption Under the Modified Plan with Respect to Certain Expired or Terminated Contracts or Leases Previously Deemed to be Assumed or Assumed and Assigned Under Confirmed Plan of Reorganization (Docket No. 17767)

Limited Objection of American Aikoku Alpha, Inc. to the First Amended Joint Plan of Reorganization of Delphi Corporation and Certain Affiliates, Debtors and Debtors-in-Possession Possession, as Modified (Docket No. 17773)

X

Preliminary Objection of IUE-CWA to Motion for Order Authorizing and Approving the Equity Purchase and Commitment Agreement Pursuant to Sections 105(a), 363(b), 503(b) and 507(a) of the Bankruptcy Code (Docket No. 17793)

Objection Coupled with Chose in Action to Debtors Modification of the Confirmed First Amended Joint Plan of Reorganization filed by Vincent Rhynes (Docket No. 17824)

Objection by Brazeway, Inc. to Notice of Non-Assumption Under the Modified Plan with Respect to Certain Expired or Terminated Contracts or Leases Previously Deemed to be Assumed or Assumed and Assigned Under Confirmed Plan of Reorganization (Docket No. 18022) (This objection has been resolved)



Reorganization (Docket No. 18217) (Assumption and Assignment Objection adjourned to August 17, 2009)

Objection of Howard County, Indiana to Approval/Confirmation of the First Amended Joint Plan of Reorganization of Delphi Corporation and Certain Affiliates, Debtors and Debtors-in-Possession (as Modified) and for Clarification of Certain Provisions of the (A) First Amended Joint Plan of Reorganization of Delphi Corporation and Certain Affiliates, Debtors and Debtors-in-Possession (as Modified) and (B) Master Disposition Agreement Among Delphi Corporation, GM Components Holdings, LLC, General Motors Corporation, Parnassus Holdings II, LLC and the Other Sellers and Other Buyers Party Thereto (Docket No. 18218)

Objection of Clarion Corporation of America to (I) Approval and/or Confirmation of the Master Disposition Agreement and/or the Modified First Amended Joint Plan of Reorganization of Debtors and (II) the Proposed Treatment of Executory Contracts to the Extent Inconsistent with Prior Settlement Agreement (Docket No. 18219)

PBR Tennessee, Inc.'s Objection to Assumption of Executory Contract Pursuant and Subject to the Terms of Debtors' First Amended Joint Plan of Reorganization (as Modified) and to Confirmation of the Plan to the Extent Such Plan Includes Assumption of the Executory Contract (Redacted Version) Docket No. 18220)

Limited Objection of Audio MPEG, Inc. and S.I.SV.EL., S.p.A. to (A) Confirmation of First Amended Joint Plan of Reorganization of Delphi Corporation and Certain Affiliates, Debtors and Debtors-in-Possession (as Modified) and (B) Assumption and Assignment with Respect to Certain Executory Contracts or Unexpired Leases to be Assumed and Assigned to Parnassus Holdings II, LLC Under Modified Plan of Reorganization (Docket No. 18221)

Limited Objection of SKF USA Inc. to Confirmation of Debtors' First Amended Plan of Reorganization of

Workers International Union to Preliminary Objection of IOUE Locals and IBEW and IAM to Debtors' Motion for Order Authorizing and Approving Modified Plan of Reorganization (Docket No. 18258)

Objection of Sunrise Medical IIIIG, Inc. to Cure Amount (Docket No. 18261) (Assumption and Assignment Objection adjourned to August 17, 2009)

State of Michigan Workers' Compensation Agency and Funds Administration's Limited Objection to Debtors'(A) Supplement to Motion for Order (I) Approving Modifications to Debtors' First Amended Plan of Reorganization (as Modified) and Related Disclosures and Voting Procedures and (II) Setting Final Hearing Date to Consider Modifications to Confirmed First Amended Plan of Reorganization and (B) Request to Set Administrative Expense Claims Bar Date and Alternative Sale Hearing Date (Docket No. 18264)

Limited Objection of the AT&T Entities to the First Amended Joint Plan of Reorganization of Delphi Corporation and Certain Affiliates, Debtors and Debtors-In-Possession, as Modified (Docket No. 18266) (Assumption and Assignment Objection adjourned to August 17, 2009)

Objection of Toyota Motor Engineering & Manufacturing North America, Inc. to (A) Confirmation of Debtors' Modifications to the First Amended Plan of Reorganization and (B) Section 363 Implementation Agreement (Docket No. 18271) (Assumption and Assignment Objection adjourned to August 17, 2009)

Objection of Brazeway, Inc. to Approval and/or Confirmation of First Amended Joint Plan of Reorganization of Delphi Corporation and Certain Affiliates, Debtors and Debtors-in-Possession (as Modified) (Docket No. 18273) (This objection has been resolved)



Objection of the State of New York to Debtors' Motion for Entry of Order Approving Modifications to Confirmed Amended First Plan of Reorganization and

*X the Master Disposition Agreement Attached Thereto
(Docket No. 18276) (This objection has been
resolved)*

*Objection to Debtors' Proposed Modifications to
Debtors' First Amended Plan of Reorganization (as
Modified) filed by Dennis Black, Charles Cunningham,
and the Delphi Salaried Retiree Association (Docket
No. 18277)*

*Limited Objection and Reservation of Rights of UAW
Regarding Debtors' Supplement to Plan Modification
Approval or Alternative Sale Motion (Docket No.
18279)*

*Fiduciary Counselors Inc.'s Objection to
Confirmation of Debtors' Modified Plan of
Reorganization (Docket No. 18282)*

*Objection of JPMorgan Chase Bank, N.A. to the
Proposed Sale of All or Substantially All of the
Debtors' Assets to Affiliates of General Motors and
Platinum Equity LLC (Docket No. 18283) (This
objection has been resolved)*

*Joinder and Reservation of Rights of Liquidity
Solutions, Inc., as Assignee, to Objection of Official
Committee of Unsecured Creditors to the Proposed
Modifications to the Debtors' Confirmed Plan of
Reorganization and to the Sale of Substantially All the
Debtors' Assets as an Alternative to the Plan and
Related Pleadings (Docket No. 18286)*

*Supplemental Objection of the Official Committee of
Unsecured Creditors to the Proposed Modifications to
the Debtors' Confirmed Plan of Reorganization and to
the Sale of Substantially All the Debtors' Assets as an
Alternative to a Plan; and Objection to Debtors'
Motion for Extension of Their Exclusive Periods
(Docket No. 18291) (This objection has been
resolved)*

*X Statement of Pension Benefit Guaranty Corporation in
Response to First Amended Joint Plan of Delphi
Corporation and Certain Affiliates, Debtors and
Debtor-in-Possession (Docket No. 18292) (The
Debtors have reached a settlement with the PBGC)*

*

United States of America's Response to Debtors' Objection to the Claim of the United States Environmental Protection Agency (Claim No. 14309) (Docket No. 18330)

Limited Objection and Reservation of Rights of Appaloosa Management L.P. and A-D Acquisition Holdings, LLC with Respect to the Debtors' Plan Modification Approval Motion and Related Documents (Docket No. 18345)

Joinder of Pardus DPH Holding LLC and Pardus Special Opportunities Master Fund L.P. in Limited Objection and Reservation of Rights of Appaloosa Management L.P. and A-D Acquisition Holdings, LLC with Respect to the Debtors' Plan Modification Approval Motion and Related Documents (Docket No. 18347)

Joinder of UBS Securities LLC to Limited Objection and Reservation of Rights of Appaloosa Management L.P. and A-D Acquisition Holdings, LLC with Respect to the Debtors' Plan Modification Approval Motion and Related Documents (Docket No. 18348)

Joinder of Harbinger Del-Auto Investment Company Ltd. and Harbinger Capital Partners Master Fund I, Ltd. in the Limited Objection and Reservation of Rights of Appaloosa Management L.P. and A-D Acquisition Holdings, LLC with Respect to the Debtors' Plan Modification Approval Motion and Related Documents (Docket No. 18349)

Joinder of Merrill Lynch, Pierce, Fenner & Smith Incorporated to Limited Objection and Reservation of Rights of Appaloosa Management L.P. and A-D Acquisition Holdings, LLC with Respect to the Debtors' Plan Modification Approval Motion and Related Documents (Docket No. 18350)

Objection of Creditor F&G Tool & Die Co. Inc. to Cure Amount With Respect to Executory Contracts to be Assumed and Assigned to Parnassus Holdings II, LLC Under Modified Plan of Reorganization [Docket No. 18076] (Docket No. 18358) (Assumption and Assignment Objection adjourned to August 17, 2009)

*Assumed and Assigned (Docket No. 18494)
(Assumption and Assignment Objection adjourned
to August 17, 2009)*

*Limited Objection Relating to Assumption and
Assignment of Executory Contracts by Flextronics
International, Ltd. (Docket No. 18545) (Assumption
and Assignment Objection adjourned to August 17,
2009)*

*Limited Objection of United Parcel Service to July 10,
2009 Notice of Filing of Notices of Assumption and
Assignment with Respect to Certain Executory
Contracts or Unexpired Leases to be Assumed and
Assigned to Parnassus Holdings II, LLC Under
Modified Plan of Reorganization (Docket No. 18546)
(Assumption and Assignment Objection adjourned
to August 17, 2009)*

*Limited Objection Relating to Assumption and
Assignment of Executory Contracts by Sun
Microsystems, Inc., et al. (Docket No. 18547)
(Assumption and Assignment Objection adjourned
to August 17, 2009)*

*Objection of NEC Electronics America, Inc. to
Debtor's Notice of Non-Assumption Under the
Modified Plan with Respect to Certain Expired or
Terminated Contracts or Leases Previously Deemed
to be Assumed or Assumed and Assigned Under
Confirmed Plan of Reorganization (as Listed in
Docket No. 17728) (Docket No. 18556) (Assumption
and Assignment Objection adjourned to August 17,
2009)*

*Limited Objection and Reservation of Rights of
Carrier Corporation with Respect to Corrected Notice
of Assumption and Assignment with Respect to
Certain Executory Contracts or Unexpired Leases to
be Assumed and Assigned to Parnassus Holdings II,
LLC Under Modified Plan of Reorganization (Docket
No. 18565) (Assumption and Assignment Objection
adjourned to August 17, 2009)*

*Objection and Reservation of Rights of Technical
Materials, Inc. to Debtors' (A) Notice of Assumption
and Assignment with Respect to Certain Executory*

Parnassus Holdings II, LLC Under Seal (Docket No. 17014)

First Amended Joint Plan of Reorganization of Delphi Corporation and Certain Affiliates, Debtors and Debtors-In-Possession (as Modified) (Docket No. 17030)

Supplement to First Amended Disclosure Statement with Respect to First Amended Joint Plan of Reorganization of Delphi Corporation and Certain Affiliates, Debtors and Debtors-In-Possession (as Modified) (Docket No. 17031)

Order (A)(I) Approving Modifications to Debtors' First Amended Plan of Reorganization (as Modified) and Related Disclosures and Voting Procedures and (II) Setting Final Hearing Date to Consider Modifications to Confirmed First Amended Plan of Reorganization and (B) Setting Administrative Expense Claims Bar Date and Alternative Transaction Hearing Date (Docket No. 17032)

Affidavit of Service of Evan Gershbein for Solicitation Materials Served On or Before June 20, 2009 (Docket No. 17267)

Affidavit of Service of Financial Balloting Group LLC of Solicitation Packages on Holders of Public Securities (Docket No. 17268)

Order Amending and Supplementing (i) Order (A)(I) Approving Modifications to Debtors' First Amended Plan of Reorganization (as Modified) and Related Disclosures and Voting Procedures and (II) Setting Final Hearing Date to Consider Modifications to Confirmed First Amended Plan of Reorganization and (B) Setting Administrative Expenses Claims Bar Date and Alternative Transaction Hearing Date (Docket No. 17032) and (ii) the Protective Order Governing Production and Use of Confidential and Highly Confidential Information in Connection with (A) Supplement to Plan Modification Approval Motion and (B) Supplement to GM Arrangement Fourth and Fifth Amendment Approval Motion (Docket No. 16920) (Docket No. 17376)

Motion of Hyundai Motor Company and Hyundai Motor America Pursuant to Rule 3018(a) Requesting Temporary Allowance of Claims for Purposes of Voting to Accept or Reject the Plan (Docket No. 17481) (Motion granted at July 23, 2009 omnibus hearing)

Rule 3018(a) Motion for Relief filed by IUOE and IBEW (Docket No. 17528) (Motion granted at July 23, 2009 omnibus hearing)

Motion For Order Estimating Claims For Purposes Of Voting On Plan Of Reorganization filed by Fiduciary Counselors, Inc. (Docket No. 17539) (Motion granted at July 23, 2009 omnibus hearing)

July 2, 2009 Notice of Filing of Plan Exhibits with Respect to First Amended Joint Plan of Reorganization of Delphi Corporation and Certain Affiliates, Debtors and Debtors-in-Possession (as Modified) (Docket No. 17557)

Notice of Section 363 Implementation Agreement in Accordance with First Amended Joint Plan of Reorganization of Delphi Corporation and Certain Affiliates, Debtors and Debtors-in-Possession (as Modified) and Master Disposition Agreement (Docket No. 17558)

Supplemental Ex Parte Application Under 11 U.S.C. § 107(b) and Fed. R. Bankr. P. 9018 for Order Authorizing Debtors to File Certain Exhibits and Schedules to Master Disposition Agreement With GM Components Holdings, LLC, General Motors Corporation, and Parnassus Holdings II, LLC Under Seal (Docket No. 17561)

Order Under 11 U.S.C. § 107(b) and Fed. R. Bankr. P. 9018 Authorizing Debtors to File Certain Exhibits and Schedules to Amended and Restated Global Settlement Agreement and Master Restructuring Agreement with GM Components Holdings, LLC, General Motors Corporation, and Parnassus Holdings II, LLC Under Seal (Docket No. 17753)

Supplement To Motion For Order Estimating Claims For Purposes Of Voting On Plan Of Reorganization

*and Second Supplemental Modification Procedures
Order (Docket No. 18352) (Docket No. 18551)*

*Notice of Filing of Settlement Agreement Between
Delphi Corporation and the Pension Benefit Guaranty
Corporation (Docket No. 18559)*


*Notice of Adjournment of Plan Modification Hearing
Previously Scheduled for July 23, 2009 (Docket No.
18567)*

*Supplemental Declaration of Evan Gershbein
Regarding Tabulation of Ballots with Respect to Vote
on First Amended Joint Plan of Reorganization (as
Modified) of Delphi Corporation and Certain of Its
Subsidiaries and Affiliates (Docket No. 18577)*

*Notice of Adjournment of Hearing on Objections to
Notices of Non-Assumption, Cure Amounts, and
Assumption and Assignment of Executory Contracts
and Unexpired Leases to August 17, 2009 (Docket No.
18649)*

*Statement Notice Of Filing Of Exhibit B To Settlement
Agreement Between Delphi Corporation And The
Pension Benefit Guaranty Corporation (Docket No.
18657)*

*Notice of Sale Notice Of Successful Bidder At Auction
(Docket No. 18658)*

	OBJECTION DOCKET NO.	OBJECTION ASSERTED	RESOLUTION, RESPONSE, OR PROPOSAL
		claim or interest of a particular class, unless the holder of a particular claim or interest agrees to a less favorable treatment of such claim or interest," all administrative claims are entitled to similar treatment.	<p>2007) (stating that "it is not clear from either the language of the statute or its legislative history whether section 1123(a)(1) prohibits the classification of section 507(a)(2), (a)(3) and (a)(8) claims or merely makes such classification permissive.").</p> <p>Moreover, to the extent that the Plan Investors' Counterclaims would result in allowed administrative expenses, the objectors do not currently hold allowed claims under section 507(a)(1), and thus section 1129(a)(9)(A) does not mandate that they be paid on the Effective Date. Furthermore, debtors, especially in cases the same size and complexity as these, routinely pay administrative claims after the effective date of plan. See, e.g., <u>In re Dana Corp.</u>, Case No. 06-10354 (Bankr. S.D.N.Y. Dec. 26, 2007) (order confirming plan establishing administrative claims bar date after effective date); <u>In re Delta Air Lines, Inc.</u>, Case No. 05-17923 (Bankr. S.D.N.Y. Apr. 25, 2007) (same). To require a debtor to do otherwise, which is essentially what requiring a reservation for the Plan Investors' Counterclaims would do, would place an unreasonable burden on debtors to identify and resolve all administrative claims prior to the effective date of a plan. Such a burden should not be placed on the Debtors.</p>
46.	18286, 18291	Asserts that the Alternative 363 Sale would be an improper <u>sub rosa</u> plan.	This objection has been resolved.
47.	18194	The Texas Taxing Authorities seek clarification that in the event that the Alternative 363 Sale occurs, any liens secured by the property to be sold would attach to the proceeds of the sale in the order and priority that the liens had against the property sold.	The Debtors do not dispute that in the event of an Alternative 363 Sale, the Texas Taxing Authorities would retain their rights under applicable law.
48.	18313, 18471 (Untimely)	Asserts that the Modified Plan does not provide for adequate means for the implementation of the Modified Plan because it does not provide for the disposition of avoidance action proceeds.	DPH Holdings retains the assets of the avoidance actions, and will use the proceeds to pay administrative claims or repay the loan from GM.
49.	18002, 17951 	Gary Y. Cook and Sharyl Y. Carter object to the treatment of individual workers' compensation claims asserted in the amounts of \$311,800.00 and \$50,000,000.00 (plus interest) respectively. Mr. Cook argues that his claim cannot be modified under the Modified Plan because it would contradict a 2003 order issued by the Michigan Department of Consumer and Industry Services Bureau of Workers' Disability Compensation/Board of Magistrates.	The Modified Plan does not alter the Debtors' injured employees' ability to seek workers' compensation payments. Each individual worker who filed a timely claim will be entitled to a distribution under the Modified Plan in accordance with the priority scheme under section 507 of the Bankruptcy Code to the extent such claim has not already been paid following the Petition Date pursuant to the claims adjudication process authorized by this Court in these chapter 11 cases. To the extent that an individual Delphi employee failed to file a timely claim, that employee's workers' compensation claim is barred by the bar date order entered by this Court.

OBJECTION DOCKET NO.	OBJECTION ASSERTED	RESOLUTION, RESPONSE, OR PROPOSAL
X	X	<p>Mr. Cook had filed proof of claim no. 5408, which was modified on the Debtors' Thirty-Fourth Omnibus Claims Objection from an unliquidated claim asserting priority treatment to a general unsecured claim in the amount of \$0.00</p> <p>Ms. Carter's proof of claim no. 17951 was objected to on the Debtors' Thirty-Fourth Omnibus Claims Objection. Because she filed a response to the objection, the hearing on that objection to that proof of claim is adjourned indefinitely pursuant to the claims objection procedures authorized by this Court.</p>
50. 18228, 18490	<p>Lear Corporation ("Lear") asserts that any chapter 5 avoidance action against Lear is prohibited by the automatic stay in Lear's bankruptcy case and that any pending action against Lear should be dismissed and removed from Exhibit 7.19 to the Modified Plan.</p>	<p>To the extent that there is a pending avoidance action against Lear, which is presently stayed by the Preservation Of Estate Claims Procedures Order, as Modified (Docket Nos. 9105, 13277, 13484), the Debtors will consent to the resolution of such avoidance claims against Lear as part of the claim reconciliation process in Lear's bankruptcy case. It would not be appropriate for the Debtors to dismiss any actions against Lear, as such a dismissal could be construed as an abandonment of the Debtors' claims.</p>
51. 18223	<p>SKF USA Inc. ("SKF") objects to Modified Plan to the extent that it seeks to limit the Debtor's cure obligations to amounts due as of the time notices were issued and various prior deadlines. SKF requests inclusion of language in the order confirming the Modified Plan stating (i) that nondebtor counterparties shall be entitled to payment in full on any executory contract obligation that has accrued, but is not in default, as of the moment such executory contract is assumed and assigned, (ii) whether the Debtors or the assignee of such contract is liable for such accrued obligations, and (iii) if the Debtors are liable for such obligations, that these obligations shall either be paid in the ordinary course of business or through administrative claims allowance process set forth in the Modified Plan.</p>	<p>This is not an objection to confirmation of the Modified Plan. The Debtors assert that the procedures set forth in Article 8 of the Plan provide for the cure of all defaults under the contract counterparties' executory contracts, and that such procedures are appropriate, notwithstanding the fact that the Debtors may make cure payments after the Effective Date.</p>

Docket No.	Objector
47169	Wilmington Trust Company
47264	Collective of DIP Lenders
17591	Sharyl Y. Carter
47611	Pima County
47615	Computer Sciences Corporation
47406	Kensington International limited, Manchester Securities Corp., and Springfield Associates, LLC
17767	American Aikoku Alpha, Inc.
17773	American Aikoku Alpha, Inc.
17793	IUE-CWA
18002	Gary Y. Cook
18022	Brazeway, Inc.
18110	IUOE Locals and IBEW and IAM
18193	Comerica Leasing Corporation
18194	Texas Taxing Authorities
18214	Michigan Department Energy Quality
18215	Robert Bosch LLC
18216	Ace Companies
18217	Robert Bosch LLC
18218	Howard County, Indiana
18219	Clarion Corporation of America
18220	PBR Tennessee, Inc.
18221	Audio MPEG, Inc and Societa' Italiana per lo Sviluppo dell'Elettronica
18223	SKF USA Inc.
18228	Lear Corporation
18229	Freudenberg-NOK General Partnership, Freudenberg-NOK de Queretaro, S.A. de C.V. and Freudenberg Filtration Technologies
18233	Pentastar Aviation, LLC and Automotive Air Charter
18234	Connecticut General Life Insurance
18235	Ogura Clutch Company
18245	XM Satellite Radio Inc.
18254	Autocam Corporation
18256	Furukawa Electric Company, Ltd and Furukawa Electric North America
18258	The United Steel, Paper & Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service International Union
18261	Sunrise Medical HHG, Inc.
18264	State of Michigan Workers' Compensation Agency and Funds Administration
18266	AT&T Corp., AT&T Solutions Inc., and SBC Global Services Inc.

Docket No.	Objector
18271	Toyota Motor Engineering & Manufacturing North America Inc.
18273	Brazeway, Inc.
18276	State of New York Department of Environmental Conservation
18277	DSR Dennis Black and Charles Cunningham
18279	UAW
18282	Fiduciary Counselors, Inc.
18283	JP Morgan Chase Bank, N.A.
18286	Liquidity Solutions, Inc
18291	Official Committee of Unsecured Creditors
18292	Pension Benefit Guaranty Corporation
18293	Inveva Products LLC
18294	New York State Workers' Compensation Board
18296	Kensington International Limited, Manchester Securities Corp. and Springfield Associates LLC
18297	Hewlett-Packard Company
18300	Collective of DIP Lenders
18313	Wilmington Trust Company
18323	F&G Multi-Slide Inc
18325	Aleaciones de Metales Sinterizados
18345 (Untimely)	Appaloosa Management L.P. and A-D Acquisition Holdings, LLC
18347 (Untimely)	Pardus DPH Holding LLC and Pardus Special Opportunities Master Fund
18348 (Untimely)	UBS Securities LLC
18349 (Untimely)	Harbinger Del-Auto Investment Company Ltd and Harbinger Capital Partners Master Fund I, Ltd.
18350 (Untimely)	Merrill Lynch, Pierce, Fenner & Smith Incorporated
18358	F&G Multi-Slide Inc
18366	James B. Sumpter
18367	James B. Sumpter
18368	Autocam Corporation
18369	Motorola, Inc
18370	USW
18372	Continental AG and its affiliates
18373	XM
18374	Navistar, Inc.
18382	Bing Metals Group, LLC
18385	Linamar Corporation, Vehcom Division
18386	Linamar Corporation, Rocel Division
18387	Linamar Corporation, Inavar Division
18388	Linamar Corporation and Linamar Holdings, Inc.

July 27, 2009
Form Of Order

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----	x	
	:	
In re	:	Chapter 11
	:	
DELPHI CORPORATION, <u>et al.</u> ,	:	Case No. 05-44481 (RDD)
	:	
Debtors.	:	(Jointly Administered)
	:	
-----	x	

ORDER APPROVING MODIFICATIONS UNDER 11 U.S.C. § 1127(b) TO
(I) FIRST AMENDED JOINT PLAN OF REORGANIZATION OF DELPHI
CORPORATION AND CERTAIN AFFILIATES, DEBTORS AND
DEBTORS-IN-POSSESSION, AS MODIFIED AND
(II) CONFIRMATION ORDER (DOCKET NO. 12359)

("PLAN MODIFICATION ORDER")

Upon the Court's Findings of Fact, Conclusions of Law, And Order Under
11 U.S.C. §§ 1129(a) And (b) And Fed. R. Bankr. P. 3020 Confirming the First Amended
Joint Plan Of Reorganization Of Delphi Corporation ("Delphi") And Certain Affiliates,
Debtors And Debtors-In-Possession (each, a "Debtor"), As Modified (the "Confirmed
Plan"), dated January 25, 2008 (Docket No. 12359) (the "Confirmation Order"); and

Upon the Debtors' Motion for Order (I) Approving Modifications to
Debtors' First Amended Plan of Reorganization (as Modified) and Related Disclosures
and Voting Procedures and (II) Setting Final Hearing Date to Consider Modifications to
Confirmed First Amended Plan of Reorganization (Docket No. 14310), dated October 3,
2008, (the "Plan Modification Approval Motion"); and

Upon the Debtors' (A) Supplement to Motion for Order (I) Approving
Modifications to Debtors' First Amended Plan of Reorganization (as Modified) and

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Form Of Order

Delphi-PBGC Settlement Agreement exists. The record also reflects that clear grounds exist under Section 4042 of ERISA, 29 U.S.C. § 1342, for the PBGC to initiate involuntary terminations of the Pension Plans, for the Debtors to enter into termination and trusteeship agreements with the PBGC, and that the PBGC has determined to seek involuntary terminations to reduce the PBGC's own exposure under the Pension Plans. The consideration provided under the Delphi-PBGC Settlement Agreement is fair and reasonable, and is in the best interests of the estate, in light of the potential amount of a PBGC claim arising out of plan termination and the need to obtain releases from the PBGC to effectuate the sale pursuant to this Modified Plan and under the MDA Documents. For the reasons set forth in the Debtors' Omnibus Reply, the Court finds that neither (1) the Delphi-PBGC Settlement Agreement, (2) the potential involuntary termination of the Delphi HRP, nor (3) the Debtors' consent to a termination and trusteeship agreement with the PBGC as a result of the PBGC having decided to implement an involuntary termination of the Delphi HRP or the Packard Hughes Bargaining Interconnect Bargaining Retirement Plan violates (a) the Labor MOUs,⁴ or any modifications thereto, (b) the orders of this Court pursuant to 11 U.S.C. §§ 363, 1113, and 1114 approving each of the Labor MOUs on terms and conditions described in those orders (the "Union 1113/1114 Settlement Approval Orders"), (c) the Local Agreement Between Delphi Connection Systems (formerly Packard-Hughes Interconnect) And

⁴ "Labor MOUs" means the UAW-Delphi-GM Memorandum of Understanding, the IUE-CWA-Delphi-GM Memorandum of Understanding, the USW-Home Avenue Memorandum of Understanding, the USW-Vandalia Memorandum of Understanding, the IUOE Local 832S Memorandum of Understanding, the IUOE Local 18S Memorandum of Understanding, the IUOE Local 101S Memorandum of Understanding, the IBEW E&S Memorandum of Understanding, the IBEW Powertrain Memorandum of Understanding, and the IAM-Delphi Memorandum of Understanding, each as defined in the Modified Plan.

July 27, 2009
Form Of Order

Debtors' estates and allows substantial distributions to be made to the holders of Claims and Interests, which could not be made without the Delphi-GM Global Settlement Agreement:

(c) The GM Releases are an important part of the Modified Plan because, as set forth in section 4.01(l) of the Delphi-GM Global Settlement Agreement, and as acknowledged by the Debtors, GM would not have agreed to make these substantial contributions to the Debtors' estates without obtaining the GM Releases;

(d) The breadth of the GM Releases is necessary to the Modified Plan and bears a reasonable relationship to the protection of the Debtors' estates; and

(e) Absent the Delphi-GM Global Settlement Agreement and the GM Releases, as a result of existing indemnification agreements and GM's filed claims for indemnification and contribution, the third-party claims that are being released thereby may have indirectly impacted the Debtors and /or Reorganized Delphi.

Accordingly, the GM Releases, including the third-party releases, are consistent with sections 105, 1123, and 1129 of the Bankruptcy Code and the law in the Second Circuit, and should be, and hereby are, approved.

LL. PBGC Settlement. The Debtors have demonstrated good, sufficient, and sound business purposes and justification for entering into the Delphi-PBGC Settlement Agreement, which was executed by Delphi and the PBGC on July 21, 2009. The PBGC Settlement Agreement was filed with the Bankruptcy Court on July 21, 2009 (Docket No. 18559). The record reflects that the Debtors would be unable to reorganize under the Modified Plan so long as the Debtors' liability under the Pension Plans covered by the

Hearing Date: July 29, 2009
Hearing Time: 10:00 a.m. (prevailing Eastern time)

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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	
In re	: Chapter 11
DELPHI CORPORATION, <u>et al.</u> ,	: Case No. 05-44481 (RDD)
Debtors.	: (Jointly Administered)
-----X	

PROPOSED AGENDA FOR PLAN MODIFICATION HEARING

Location Of Hearing: United States Bankruptcy Court for the Southern District of New York,
Alexander Hamilton Custom House, Room 610, 6th Floor, One
Bowling Green, New York, New York 10004-1408

The matters set for hearing are divided into the following categories for the purposes of this
Proposed Agenda:

- A. Introduction
- B. Contested Matters (1 Matter)
- B. Contested Matters (1 Matter)

- 1. **"Supplement to Plan Modification Approval Motion"** (A) Supplement to Motion for Order (I) Approving Modifications to Debtors' First Amended Plan of Reorganization (as Modified) and Related Disclosures and Voting Procedures and (II) Setting Final Hearing Date to Consider Modifications to Confirmed First Amended Plan of Reorganization and (B) Request to Set Administrative Expense Claims Bar Date and Alternative Sale Hearing Date (Docket No. 16646)

Responses filed: See letter objections listed on Schedules 1(pension) and 2 (severance) hereto.

Response By Robert Ward (Docket No. 14338)



Objection By Sheryl Carter (Docket No. 14339)

Liquidity Solutions, Inc.'s Objection To Motion For Order (I) Approving Modifications To Debtors' First Amended Plan Of Reorganization (As Modified) And Related Disclosures And Voting Procedures And (II) Setting Final Hearing Date To Consider Modifications To Confirmed First Amended Plan Of Reorganization (Docket No. 14340)

Statement Of Pension Benefit Guaranty Corporation In Response To Debtors' Supplement To Plan Modification Approval Motion (Docket No. 16893) (The Debtors have reached a settlement with the PBGC)

Objection of Kensington International Limited, Manchester Securities and Springfield Associates, LLC To Debtors' Motion Seeking To Modify Its Plan

Preliminary Objection of IUOE Locals and IBEW and IAM to Debtors' Motion for Order Authorizing and Approving Modified Plan of Reorganization (Docket No. 18110)

Limited Objection of Raymond L. Johnson, Jr. to Approval of Modified Plan (Docket No. 18130)

Objection of Comerica Leasing Corporation to First Amended Joint Plan of Delphi Corporation and Certain Affiliates, Debtors and Debtors in Possession (as Modified) (Docket No. 18193)

Objection of Texas Taxing Authorities to Proposed Plan Modifications of Debtor's First Amended Plan of Reorganization (Docket No. 18194)

Michigan Department of Environmental Quality's Limited Objection to the First Amended Plan of Reorganization of Delphi Corporation and Certain Affiliates, Debtors and Debtors-in-Possession (as Modified) and Any Alternate Sales Transactions (Docket No. 18211) (This objection has been resolved)

Response and Limited Objection of Robert Bosch LLC's to Debtors July 10, 2009 Notice of Filing Notices of Assumption and Assignment to Certain Executory Contracts or Unexpired Leases to be Assumed and Assigned to GM Component Holdings, LLC or Steering Solution Services Corporation, as Applicable, Under Modified Plan of Reorganization (Docket No. 18215) (Assumption and Assignment Objection adjourned to August 17, 2009)

Limited Objection of the Ace Companies to First Amended Joint Plan of Reorganization of Delphi Corporation and Certain Affiliates, Debtors and Debtors-in-Possession (as Modified) (Docket No. 18216)

Response and Limited Objection of Robert Bosch LLC's to Debtors July 13, 2009 Notice of Filing Certain Corrected Notices of Assumption and Assignment to Certain Executory Contracts or Unexpired Leases to be Assumed and Assigned to Parnassus Holdings II, LLC Under Modified Plan c

Reorganization (Docket No. 18217) (Assumption and Assignment Objection adjourned to August 17, 2009)

Objection of Howard County, Indiana to Approval/Confirmation of the First Amended Joint Plan of Reorganization of Delphi Corporation and Certain Affiliates, Debtors and Debtors-in-Possession (as Modified) and for Clarification of Certain Provisions of the (A) First Amended Joint Plan of Reorganization of Delphi Corporation and Certain Affiliates, Debtors and Debtors-in-Possession (as Modified) and (B) Master Disposition Agreement Among Delphi Corporation, GM Components Holdings, LLC, General Motors Corporation, Parnassus Holdings II, LLC and the Other Sellers and Other Buyers Party Thereto (Docket No. 18218)

Objection of Clarion Corporation of America to (I) Approval and/or Confirmation of the Master Disposition Agreement and/or the Modified First Amended Joint Plan of Reorganization of Debtors and (II) the Proposed Treatment of Executory Contracts to the Extent Inconsistent with Prior Settlement Agreement (Docket No. 18219)

PBR Tennessee, Inc.'s Objection to Assumption of Executory Contract Pursuant and Subject to the Terms of Debtors' First Amended Joint Plan of Reorganization (as Modified) and to Confirmation of the Plan to the Extent Such Plan Includes Assumption of the Executory Contract (Redacted Version) Docket No. 18220)

Limited Objection of Audio MPEG, Inc. and S.I.SV.EL., S.p.A. to (A) Confirmation of First Amended Joint Plan of Reorganization of Delphi Corporation and Certain Affiliates, Debtors and Debtors-in-Possession (as Modified) and (B) Assumption and Assignment with Respect to Certain Executory Contracts or Unexpired Leases to be Assumed and Assigned to Parnassus Holdings II, LLC Under Modified Plan of Reorganization (Docket No. 18221)

Limited Objection of SKF USA Inc. to Confirmation of Debtors' First Amended Plan of Reorganization of

Delphi Corporation and Certain Affiliates, Debtors and Debtors-in-Possession (as Modified) and Proposed Modifications Thereto (Docket No. 18223)

Objection of Lear Corporation to Approval of First Amended Joint Plan of Delphi Corporation and Certain Affiliates, Debtors and Debtors in Possession (as Modified) (Docket No. 18228)

Objection of Freudenberg-NOK General Partnership (and its subsidiaries Vibraoustic de Mexico, S.A. de C.V., Freudenberg-NOK, Inc., Freudenberg-NOK de Queretaro, S.A. de C.V., and Freudenberg-NOK de Mexico, S.A. de C.V.), Freudenberg Filtration Technologies, L.P. f/k/a Freudenberg Nomwovens, L.P. and Freudenberg NOK Mechatronics GmbH & Co. KG to Approval of First Amended Joint Plan of Delphi Corporation and Certain Affiliates, Debtors in Possession (as Modified) (Docket No. 18229)

Objection of Pentastar Aviation, L.L.C. and Automotive Air Charter, Inc. to Approval of First Amended Joint Plan of Delphi Corporation and Certain Affiliates, Debtors and Debtors in Possession (as Modified) (Docket No. 18233)

Objection of Connecticut General Life Insurance Company to First Amended Joint Plan of Reorganization of Delphi Corporation and Certain Affiliates, Debtors and Debtors-in-Possession (as Modified) (Docket No. 18234) (Assumption and Assignment Objection adjourned to August 17, 2009)

Creditor, Ogura Clutch Company's, Objection to Debtor's Modified Plan (Docket No. 18235) (Assumption and Assignment Objection adjourned to August 17, 2009)

Objection of Creditor Renee Adamski to Debtors' First Amended Plan of Reorganization (as Amended) (Docket No. 18236)

Objections of Creditor Michael Andrud to Debtor's First Amended Plan of Reorganization (as Amended) (Docket No. 18238)

*Objections of Creditor Michael Clancy to Debtor's
First Amended Plan of Reorganization (as Amended)
Docket No. 18240)*

*Objections of Creditor Jorge Cornejo to Debtor's
First Amended Plan of Reorganization (as Amended)
Docket No. 18241)*

*Objection of Jonathan R. Stegner to Debtor's First
Amended Plan or Reorganization (as Amended)
(Docket No. 18242)*

*Objections of Creditor Richard Varner to Debtor's
First Amended Plan of Reorganization (as Modified)
(Docket No. 18243)*

*Objections of Creditor Linda Wiersema to Debtor's
First Amended Plan of Reorganization (as Modified)
(Docket No. 18244)*

*Objection of XM Satellite Radio Inc. to the Notice of
Non-Assumption of Contract and to the First Amended
Joint Plan of Reorganization of Delphi Corporation
and Certain Affiliates, Debtors and
Debtors-in-Possession, as Modified (Docket No.
18245) (Assumption and Assignment Objection
adjourned to August 17, 2009)*

*Limited Objection of Autocam Corporation to
Confirmation of First Amended Joint Plan of Delphi
Corporation and Certain Affiliates, Debtors and
Debtors in Possession (Docket No. 18254)
(Assumption and Assignment Objection adjourned
to August 17, 2009)*

*Limited Response and Reservation of Rights of
Furukawa Electric North America APD, Inc. to
Debtors' July 2, 2009 Notice of Filing of Plan Exhibits
with Respect to First Amended Joint Plan of
Reorganization of Delphi Corporation and Certain
Affiliates, Debtors and Debtors-In-Possession (as
Modified) (Docket No. 18256) (Assumption and
Assignment Objection adjourned to August 17,
2009)*

*Joinder of United Steel, Paper & Forestry, Rubber,
Manufacturing, Energy, Allied Industrial and Service*

*Workers International Union to Preliminary
Objection of IOUE Locals and IBEW and IAM to
Debtors' Motion for Order Authorizing and Approving
Modified Plan of Reorganization (Docket No. 18258)*

*Objection of Sunrise Medical HIIG, Inc. to Cure
Amount (Docket No. 18261) (Assumption and
Assignment Objection adjourned to August 17,
2009)*

*State of Michigan Workers' Compensation Agency
and Funds Administration's Limited Objection to
Debtors'(A) Supplement to Motion for Order (I)
Approving Modifications to Debtors' First Amended
Plan of Reorganization (as Modified) and Related
Disclosures and Voting Procedures and (II) Setting
Final Hearing Date to Consider Modifications to
Confirmed First Amended Plan of Reorganization and
(B) Request to Set Administrative Expense Claims Bar
Date and Alternative Sale Hearing Date (Docket No.
18264)*

*Limited Objection of the AT&T Entities to the First
Amended Joint Plan of Reorganization of Delphi
Corporation and Certain Affiliates, Debtors and
Debtors-In-Possession, as Modified (Docket No.
18266) (Assumption and Assignment Objection
adjourned to August 17, 2009)*

*Objection of Toyota Motor Engineering &
Manufacturing North America, Inc. to (A)
Confirmation of Debtors' Modifications to the First
Amended Plan of Reorganization and (B) Section 363
Implementation Agreement (Docket No. 18271)
(Assumption and Assignment Objection adjourned
to August 17, 2009)*

*Objection of Brazeway, Inc. to Approval and/or
Confirmation of First Amended Joint Plan of
Reorganization of Delphi Corporation and Certain
Affiliates, Debtors and Debtors-in-Possession (as
Modified) (Docket No. 18273) (This objection has
been resolved)*

*Objection of the State of New York to Debtors' Motion
for Entry of Order Approving Modifications to
Confirmed Amended First Plan of Reorganization and*

the Master Disposition Agreement Attached Thereto (Docket No. 18276) (This objection has been resolved)

Objection to Debtors' Proposed Modifications to Debtors' First Amended Plan of Reorganization (as Modified) filed by Dennis Black, Charles Cunningham, and the Delphi Salaried Retiree Association (Docket No. 18277)

Limited Objection and Reservation of Rights of UAW Regarding Debtors' Supplement to Plan Modification Approval or Alternative Sale Motion (Docket No. 18279)

Fiduciary Counselors Inc.'s Objection to Confirmation of Debtors' Modified Plan of Reorganization (Docket No. 18282)

Objection of JPMorgan Chase Bank, N.A. to the Proposed Sale of All or Substantially All of the Debtors' Assets to Affiliates of General Motors and Platinum Equity LLC (Docket No. 18283) (This objection has been resolved)

Joinder and Reservation of Rights of Liquidity Solutions, Inc., as Assignee, to Objection of Official Committee of Unsecured Creditors to the Proposed Modifications to the Debtors' Confirmed Plan of Reorganization and to the Sale of Substantially All the Debtors' Assets as an Alternative to the Plan and Related Pleadings (Docket No. 18286)

Supplemental Objection of the Official Committee of Unsecured Creditors to the Proposed Modifications to the Debtors' Confirmed Plan of Reorganization and to the Sale of Substantially All the Debtors' Assets as an Alternative to a Plan; and Objection to Debtors' Motion for Extension of Their Exclusive Periods (Docket No. 18291) (This objection has been resolved)

Statement of Pension Benefit Guaranty Corporation in Response to First Amended Joint Plan of Delphi Corporation and Certain Affiliates, Debtors and Debtor-in-Possession (Docket No. 18292) (The Debtors have reached a settlement with the PBGC)

Inteva Products LLC's Limited Objection and Reservation of Rights with Respect to the Plan to the Extent Such Plan Does Not Provide for the Assumption of a Certain Executory Contract and Lease Between the Debtors and Inteva (Docket No. 18293)

Limited Objection of the New York State Workers' Compensation Board (Docket No. 18294)

Objection of Kensington International Limited, Manchester Securities Corp. and Springfield Associates, LLC to (A) Confirmation of Debtors' First Amended Plan of Reorganization (as Modified) and (B) Approval of Debtors' Proposed Section 363 Sale (Docket No. 18296) (This objection has been resolved)

Limited Response to Debtors' First Amended Plan of Reorganization (as Modified) filed by Hewlett-Packard Company and Electronic Data Systems, LLC (Docket No. 18297)

First Supplemental Objection of the Collective of DIP Lenders to (A) Confirmation of Debtors' First Amended Plan of Reorganization (as Modified) and (B) Approval of Debtors' Proposed Section 363 Sale (Docket No. 18300) (This objection has been resolved)

Supplemental Objection of Wilmington Trust Company, as Indenture Trustee, to Debtors' Motion for an Order (I) Approving Plan Modifications or, in the Alternative, (II) Approving Sale of Assets (Docket No. 18313) (This objection has been resolved)

Objection of Creditor F&G Multi-Slide Inc. to Cure Amount with Respect to Executory Contracts to be Assumed and Assigned (Docket No. 18323) (Assumption and Assignment Objection adjourned to August 17, 2009)

Objection to Non-Assumption of an Executory Contract of Aleaciones De Metales Sinterizados, Pro Se of Purchase Order SAG 90I5385 Under the Modified Plan of Debtors (Docket No. 18325) (This objection has been resolved and withdrawn)

United States of America's Response to Debtors' Objection to the Claim of the United States Environmental Protection Agency (Claim No. 14309) (Docket No. 18330)

Limited Objection and Reservation of Rights of Appaloosa Management L.P. and A-D Acquisition Holdings, LLC with Respect to the Debtors' Plan Modification Approval Motion and Related Documents (Docket No. 18345)

Joinder of Pardus DPH Holding LLC and Pardus Special Opportunities Master Fund L.P. in Limited Objection and Reservation of Rights of Appaloosa Management L.P. and A-D Acquisition Holdings, LLC with Respect to the Debtors' Plan Modification Approval Motion and Related Documents (Docket No. 18347)

Joinder of UBS Securities LLC to Limited Objection and Reservation of Rights of Appaloosa Management L.P. and A-D Acquisition Holdings, LLC with Respect to the Debtors' Plan Modification Approval Motion and Related Documents (Docket No. 18348)

Joinder of Harbinger Del-Auto Investment Company Ltd. and Harbinger Capital Partners Master Fund I, Ltd. in the Limited Objection and Reservation of Rights of Appaloosa Management L.P. and A-D Acquisition Holdings, LLC with Respect to the Debtors' Plan Modification Approval Motion and Related Documents (Docket No. 18349)

Joinder of Merrill Lynch, Pierce, Fenner & Smith Incorporated to Limited Objection and Reservation of Rights of Appaloosa Management L.P. and A-D Acquisition Holdings, LLC with Respect to the Debtors' Plan Modification Approval Motion and Related Documents (Docket No. 18350)

Objection of Creditor F&G Tool & Die Co. Inc. to Cure Amount With Respect to Executory Contracts to be Assumed and Assigned to Parnassus Holdings II, LLC Under Modified Plan of Reorganization [Docket No. 18076] (Docket No. 18358) (Assumption and Assignment Objection adjourned to August 17, 2009)

Contracts or Unexpired Leases to be Assumed and Assigned to GM Components Holdings, LLC or Steering Solutions Services Corporation, as Applicable, Under Modified Plan of Reorganization (Docket No. 18401) (Assumption and Assignment Objection adjourned to August 17, 2009)

Limited Objection of ATEL Leasing Corporation to Notice of Assumption and Assignment with Respect to Certain Executory Contracts or Unexpired Leases to be Assumed and Assigned to Parnassus Holdings II, LLC Under Modified Plan of Reorganization (Docket No. 18402) (Assumption and Assignment Objection adjourned to August 17, 2009)

Siemens Product Lifecycle Management Software Inc.'s Limited Objection and Reservation of Rights to Notice of Assumption and Assignment with Respect to Certain Executory Contracts or Unexpired Leases to be Assumed and Assigned to GM Components Holdings LLC or Steering Solutions Services Corporation, as Applicable, Under Modified Plan of Reorganization (Docket No. 18414) (Assumption and Assignment Objection adjourned to August 17, 2009)

Findlay Industries, Inc.'s Objection to Notice of Assumption and Assignment with Respect to Certain Executory Contracts or Unexpired Leases to be Assumed and Assigned to Parnassus Holdings II, LLC Under Modified Plan of Reorganization (Docket No. 18417) (Assumption and Assignment Objection adjourned to August 17, 2009)

Vitec, LLC's Limited Objection to Notice of Assumption and Assignment with Respect to Certain Executory Contracts or Unexpired Leases to be Assumed and Assigned (Docket No. 18420) (Assumption and Assignment Objection adjourned to August 17, 2009)

Protective Objection and Reservation of Rights of the TT Group to the Assumption and Assignment of Executory Contracts and Cure Amounts Related Thereto (Docket No. 18430) (Assumption and Assignment Objection adjourned to August 17, 2009)

Nissan North America, Inc.'s Objection to Assumption and Assignment of Executory Contracts and to Proposed Cure Amounts in Connection Thereto (Docket No. 18456) (Assumption and Assignment Objection adjourned to August 17, 2009)

Objection to Confirmation of Debtor's First Amended Plan of Reorganization (as Modified) and Objection to the Approval of Debtor's Proposed Section 363 Sale (Docket No. 18458)

Objection of Madison County, Indiana, to Approval/Confirmation of the First Amended Joint Plan of Reorganization of Delphi Corporation and Certain Affiliates, Debtors, and Debtors in Possession (Docket No. 18461)

Limited Objection of AM General LLC to Assumption and Proposed Cure Amounts (Docket No. 18463) (Assumption and Assignment Objection adjourned to August 17, 2009)

Behr America, Inc.'s Limited Objection to Notice of Assumption and Assignment with Respect to Certain Executory Contracts or Unexpired Leases to be Assumed and Assigned to Parnassus Holdings II, LLC Under Modified Plan of Reorganization (Docket No. 18468) (Assumption and Assignment Objection adjourned to August 17, 2009)

Limited Response and Reservation of Rights of Furukawa Electric North America APD, Inc. and Furukawa Electric Company, Ltd to Debtors' July 13, 2009 Notice of Filing of Certain Corrected Notices of Assumption and Assignment with Respect to Certain Executory Contracts or Unexpired Leases to be Assumed and Assigned to Parnassus Holdings II, LLC Under Modified Plan of Reorganization (Docket No. 18472) (Assumption and Assignment Objection adjourned to August 17, 2009)

Limited Objection of General Electric Capital Corporation to Notice of Assumption and Assignment with Respect to Certain Executory Contracts or Unexpired Leases to be Assumed and Assigned to Parnassus Holdings II, LLC Under Modified Plan of Reorganization (Docket No. 18473) (Assumption and

*Notice of Filing Exhibit List of Autocam Corporation
(Docket No. 18610) (Assumption and Assignment
Objection adjourned to August 17, 2009)*

*Objection of Connecticut General Life Insurance
Company to Notice of Assumption and Assignment
with Respect to Certain Executory Contracts and
Unexpired Leases to be Assumed and Assigned to
Parnassus Holdings II, LLC Under Modified Plan of
Reorganization (Docket No. 18652) (Assumption and
Assignment Objection adjourned to August 17,
2009)*

Reply filed:

*Debtors' Omnibus Reply to Objections to Plan
Modification Approval Motion (Docket No. 16935)*

*Debtors' Debtors' Omnibus Reply In Support Of
Modified Plan And Master Disposition Agreement
(Docket No. 18659)*

Related filings:

*Motion For Order (I) Approving Modifications To
Debtors' First Amended Plan Of Reorganization (As
Modified) And Related Modifications And Related
Disclosures And Voting Procedures And (II) Setting
Final Hearing Date To Consider Modifications To
Confirmed First Amended Plan Of Reorganization
(Docket No. 14310)*

*Notice of Adjournment of Hearing Previously
Scheduled for June 2, 2009 (Docket No. 16648)*

*Amended Order Establishing Schedule for
Non-Omnibus Hearing on Hearing June 10, 2009
(Docket No. 16652)*

*Notice of Filing of Certain Exhibits and Schedules to
Master Disposition Agreement (Docket No. 16646)
(Docket No. 16936)*

*Transcript Regarding Hearing Held on June 10, 2009
at 9:35 a.m. (Docket No. 17011)*

*Ex Parte Application Under 11 U.S.C. § 107(b) and
Fed. R. Bankr. P. 9018 for Order Authorizing Debtors
to File Certain Exhibits and Schedules to Master
Disposition Agreement with GM Components
Holdings, LLC, General Motors Corporation, and*

Parnassus Holdings II, LLC Under Seal (Docket No. 17014)

First Amended Joint Plan of Reorganization of Delphi Corporation and Certain Affiliates, Debtors and Debtors-In-Possession (as Modified) (Docket No. 17030)

Supplement to First Amended Disclosure Statement with Respect to First Amended Joint Plan of Reorganization of Delphi Corporation and Certain Affiliates, Debtors and Debtors-In-Possession (as Modified) (Docket No. 17031)

Order (A)(I) Approving Modifications to Debtors' First Amended Plan of Reorganization (as Modified) and Related Disclosures and Voting Procedures and (II) Setting Final Hearing Date to Consider Modifications to Confirmed First Amended Plan of Reorganization and (B) Setting Administrative Expense Claims Bar Date and Alternative Transaction Hearing Date (Docket No. 17032)

Affidavit of Service of Evan Gershbein for Solicitation Materials Served On or Before June 20, 2009 (Docket No. 17267)

Affidavit of Service of Financial Balloting Group LLC of Solicitation Packages on Holders of Public Securities (Docket No. 17268)

Order Amending and Supplementing (i) Order (A)(I) Approving Modifications to Debtors' First Amended Plan of Reorganization (as Modified) and Related Disclosures and Voting Procedures and (II) Setting Final Hearing Date to Consider Modifications to Confirmed First Amended Plan of Reorganization and (B) Setting Administrative Expenses Claims Bar Date and Alternative Transaction Hearing Date (Docket No. 17032) and (ii) the Protective Order Governing Production and Use of Confidential and Highly Confidential Information in Connection with (A) Supplement to Plan Modification Approval Motion and (B) Supplement to GM Arrangement Fourth and Fifth Amendment Approval Motion (Docket No. 16920) (Docket No. 17376)

Motion of Hyundai Motor Company and Hyundai Motor America Pursuant to Rule 3018(a) Requesting Temporary Allowance of Claims for Purposes of Voting to Accept or Reject the Plan (Docket No. 17481) (Motion granted at July 23, 2009 omnibus hearing)

Rule 3018(a) Motion for Relief filed by IUOE and IBEW (Docket No. 17528) (Motion granted at July 23, 2009 omnibus hearing)

Motion For Order Estimating Claims For Purposes Of Voting On Plan Of Reorganization filed by Fiduciary Counselors, Inc. (Docket No. 17539) (Motion granted at July 23, 2009 omnibus hearing)

July 2, 2009 Notice of Filing of Plan Exhibits with Respect to First Amended Joint Plan of Reorganization of Delphi Corporation and Certain Affiliates, Debtors and Debtors-in-Possession (as Modified) (Docket No. 17557)

Notice of Section 363 Implementation Agreement in Accordance with First Amended Joint Plan of Reorganization of Delphi Corporation and Certain Affiliates, Debtors and Debtors-in-Possession (as Modified) and Master Disposition Agreement (Docket No. 17558)

Supplemental Ex Parte Application Under 11 U.S.C. § 107(b) and Fed. R. Bankr. P. 9018 for Order Authorizing Debtors to File Certain Exhibits and Schedules to Master Disposition Agreement With GM Components Holdings, LLC, General Motors Corporation, and Parnassus Holdings II, LLC Under Seal (Docket No. 17561)

Order Under 11 U.S.C. § 107(b) and Fed. R. Bankr. P. 9018 Authorizing Debtors to File Certain Exhibits and Schedules to Amended and Restated Global Settlement Agreement and Master Restructuring Agreement with GM Components Holdings, LLC, General Motors Corporation, and Parnassus Holdings II, LLC Under Seal (Docket No. 17753)

Supplement To Motion For Order Estimating Claims For Purposes Of Voting On Plan Of Reorganization

*filed by Fiduciary Counselors, Inc. (Docket No. 17744,
(Motion granted at July 23, 2009 omnibus hearing)*

*July 10, 2009 Notice of Filing of Notices of Amended
Cure Amount for Executory Contract or Unexpired
Lease in Connection with Cure Amounts Previously
Deemed to be Established Under Confirmed Plan of
Reorganization (Docket No. 18075)*

*July 10, 2009 Notice of Filing of Notices of
Assumption and Assignment with Respect to Certain
Executory Contracts or Unexpired Leases to be
Assumed and Assigned to Parnassus Holdings II, LLC
Under Modified Plan of Reorganization (Docket No.
18076)*

*July 10, 2009 Notice of Filing of Notices of
Assumption and Assignment with Respect to Certain
Executory Contracts or Unexpired Leases to be
Assumed and Assigned to GM Components Holdings,
LLC or Steering Solutions Services Corporation, as
Applicable, Under Modified Plan of Reorganization
(Docket No. 18077)*

*Errata Schedule 2 to Certain Notices of Assumption
and Assignment With Respect to Certain Executory
Contracts or Unexpired Leases to be Assumed and
Assigned to Parnassus Holdings II, LLC Under
Modified Plan of Reorganization (Docket No. 18168)*

*July 13, 2009 Notice of Filing of Certain Corrected
Notices of Assumption and Assignment with Respect to
Certain Executory Contracts or Unexpired Leases to
be Assumed and Assigned to Parnassus Holdings II,
LLC Under Modified Plan of Reorganization (Docket
No. 18169)*

*Stipulation and Agreed Order Modifying Paragraph
38 of Modification Procedures Order Establishing
Administrative Expense Bar Date (Docket No. 18259)*

*July 15, 2009 Notice of Filing of Additional Notices of
Assumption and Assignment with Respect to Certain
Executory Contracts or Unexpired Leases to be
Assumed and Assigned to Parnassus Holdings II, LLC
Under Modified Plan of Reorganization (Docket No.
18315)*

Declaration of Richard A. Devers in Support of Motion for Order Estimating Claims for Purposes of Voting on Plan of Reorganization (Docket No. 18317)

Declaration of Richard A. Devers in Support of Motion for Order Estimating Claims for Purposes of Voting on Plan of Reorganization (Docket No. 17539) (Docket No. 18326)

Order Amending and Supplementing Modification Procedures Order (Docket No. 17032) and Supplemental Modification Procedures Order (Docket No. 17376) (Docket No. 18352)

Expedited Motion to Enforce COBRA Benefit for Delphi Salaried Retirees and Motion for COBRA Settlement (COBRA Benefit Motion) (Docket No. 18366)

*Motion to Shorten Notice with Respect to James B. Sumpter's Expedited Motion to Enforce COBRA Benefit for Delphi Salaried Retirees and Motion for COBRA Settlement (Docket No. 18367) (**Motion denied on July 17, 2009**)*

Declaration of Evan Gershbein Regarding Tabulation of Ballots with Respect to Vote on First Amended Joint Plan of Reorganization (as Modified) of Delphi Corporation and Certain of Its Subsidiaries and Affiliates (Docket No. 18462)

Declaration of Jane Sullivan Certifying Tabulation of Ballots Regarding Vote on First Amended Joint Plan of Reorganization (as Modified) of Delphi Corporation and Certain of Its Subsidiaries and Affiliates (Docket No. 18464)

July 20, 2009 Notice of Filing of Amended Plan Exhibit 8.1(a) with Respect to First Amended Joint Plan of Reorganization of Delphi Corporation and Certain Affiliates, Debtors and Debtors-In-Possession (as Modified) (Docket No. 18492)

Order Amending and Supplementing Modification Procedures Order (Docket No. 17032), Supplemental Modification Procedures Order (Docket No. 17376),

*and Second Supplemental Modification Procedures
Order (Docket No. 18352) (Docket No. 18551)*

*Notice of Filing of Settlement Agreement Between
Delphi Corporation and the Pension Benefit Guaranty
Corporation (Docket No. 18559)*

*Notice of Adjournment of Plan Modification Hearing
Previously Scheduled for July 23, 2009 (Docket No.
18567)*

*Supplemental Declaration of Evan Gershbein
Regarding Tabulation of Ballots with Respect to Vote
on First Amended Joint Plan of Reorganization (as
Modified) of Delphi Corporation and Certain of Its
Subsidiaries and Affiliates (Docket No. 18577)*

*Notice of Adjournment of Hearing on Objections to
Notices of Non-Assumption, Cure Amounts, and
Assumption and Assignment of Executory Contracts
and Unexpired Leases to August 17, 2009 (Docket No.
18649)*

*Statement Notice Of Filing Of Exhibit B To Settlement
Agreement Between Delphi Corporation And The
Pension Benefit Guaranty Corporation (Docket No.
18657)*

*Notice of Sale Notice Of Successful Bidder At Auction
(Docket No. 18658)*

*Notice Of Filing Of Notice Of Assumption And
Assignment With Respect To Certain Executory
Contracts Or Unexpired Leases To Be Assumed And
Assigned To DIP Holdco 3, LLC Under Modified Plan
Of Reorganization (Docket No. 18660)*

Status:

*The hearing with respect to this matter will be
proceeding.*

Dated: New York, New York
July 28, 2009

SKADDEN, ARPS, SLATE, MEAGHER
& FLOM LLP

By: /s/ John Wm. Butler, Jr.
John Wm. Butler, Jr.
Ron E. Meisler

155 North Wacker Drive
Chicago, Illinois 60606
(312) 407-0700

- and -

By: /s/ Kayalyn A. Marafioti
Kayalyn A. Marafioti

Four Times Square
New York, New York 10036
(212) 735-3000

Attorneys for Delphi Corporation, et al.,
Debtors and Debtors-in-Possession

Hearing Date and Time: July 29, 2009 at 10:00 a.m. EDT

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
155 North Wacker Drive
Chicago, Illinois 60606
(312) 407-0700
John Wm. Butler, Jr.
Albert L. Hogan III
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- and -

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(212) 735-3000
Kayalyn A. Marafioti

Attorneys for Delphi Corporation, et al.,
Debtors and Debtors-in-Possession

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Toll Free: (800) 718-5305
International: (248) 813-2698

Delphi Legal Information Website:
<http://www.delphidocket.com>

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----	x	
	:	
In re	:	Chapter 11
	:	
DELPHI CORPORATION, <u>et al.</u> ,	:	Case No. 05-44481 (RDD)
	:	
Debtors.	:	(Jointly Administered)
	:	
-----	x	

**DEBTORS' OMNIBUS REPLY IN SUPPORT OF MODIFIED
PLAN AND MASTER DISPOSITION AGREEMENT**

("MODIFIED PLAN AND MASTER DISPOSITION AGREEMENT REPLY")

-
- ¹ See Order (A)(I) Approving Modifications To Debtors' First Amended Plan Of Reorganization (As Modified) And Related Disclosures And Voting Procedures And (II) Setting Final Hearing Date To Consider Modifications To Confirmed First Amended Plan Of Reorganization And (B) Setting Administrative Expense Claims Bar Date And Alternative Transaction Hearing Date, dated June 16, 2009 (Docket No. 17032).
- ² See Order Amending And Supplementing Modification Procedures Order (Docket No. 17032), Supplemental Modification Procedures Order (Docket No. 17376), And Second Supplemental Modification Procedures Order (Docket No. 18352), dated July 21, 2009 (Docket No. 18551).

Docket 18261 - Docket 18294
Dockets - 18462 - Docket 18577

	OBJECTION DOCKET NO.	OBJECTION ASSERTED	RESOLUTION, RESPONSE, OR PROPOSAL
		claim or interest of a particular class, unless the holder of a particular claim or interest agrees to a less favorable treatment of such claim or interest," all administrative claims are entitled to similar treatment.	2007) (stating that "it is not clear from either the language of the statute or its legislative history whether section 1123(a)(1) prohibits the classification of section 507(a)(2), (a)(3) and (a)(8) claims or merely makes such classification permissive.").
			Moreover, to the extent that the Plan Investors' Counterclaims would result in allowed administrative expenses, the objectors do not currently hold allowed claims under section 507(a)(1), and thus section 1129(a)(9)(A) does not mandate that they be paid on the Effective Date. Furthermore, debtors, especially in cases the same size and complexity as these, routinely pay administrative claims after the effective date of plan. <u>See, e.g., In re Dana Corp.</u> , Case No. 06-10354 (Bankr. S.D.N.Y. Dec. 26, 2007) (order confirming plan establishing administrative claims bar date after effective date); <u>In re Delta Air Lines, Inc.</u> , Case No. 05-17923 (Bankr. S.D.N.Y. Apr. 25, 2007) (same). To require a debtor to do otherwise, which is essentially what requiring a reservation for the Plan Investors' Counterclaims would do, would place an unreasonable burden on debtors to identify and resolve all administrative claims prior to the effective date of a plan. Such a burden should not be placed on the Debtors.
46.	18286, 18291	Asserts that the Alternative 363 Sale would be an improper <u>sub rosa</u> plan.	This objection has been resolved.
47.	18194	The Texas Taxing Authorities seek clarification that in the event that the Alternative 363 Sale occurs, any liens secured by the property to be sold would attach to the proceeds of the sale in the order and priority that the liens had against the property sold.	The Debtors do not dispute that in the event of an Alternative 363 Sale, the Texas Taxing Authorities would retain their rights under applicable law.
48.	18313, 18471 (Untimely)	Asserts that the Modified Plan does not provide for adequate means for the implementation of the Modified Plan because it does not provide for the disposition of avoidance action proceeds.	DPH Holdings retains the assets of the avoidance actions, and will use the proceeds to pay administrative claims or repay the loan from GM.
49.	18002, 17951	Gary Y. Cook and Sharyl Y. Carter object to the treatment of individual workers' compensation claims asserted in the amounts of \$311,800.00 and \$50,000,000.00 (plus interest) respectively. Mr. Cook argues that his claim cannot be modified under the Modified Plan because it would contradict a 2003 order issued by the Michigan Department of Consumer and Industry Services Bureau of Workers' Disability Compensation/Board of Magistrates.	The Modified Plan does not alter the Debtors' injured employees' ability to seek workers' compensation payments. Each individual worker who filed a timely claim will be entitled to a distribution under the Modified Plan in accordance with the priority scheme under section 507 of the Bankruptcy Code to the extent such claim has not already been paid following the Petition Date pursuant to the claims adjudication process authorized by this Court in these chapter 11 cases. To the extent that an individual Delphi employee failed to file a timely claim, that employee's workers' compensation claim is barred by the bar date order entered by this Court.

	OBJECTION DOCKET NO.	OBJECTION ASSERTED	RESPONSE OF DEBTORS
			<p>Mr. Cook had filed proof of claim 18228, which was modified by the Debtors' Thirty-Fourth Omnibus Claims Conference to determine the proper priority of the claim, giving priority treatment to a general unsecured claim in the amount of \$50,000.</p> <p>Ms. Carter's proof of claim 18490 was filed with the Debtors' Thirty-Fourth Omnibus Claims Conference in response to the objection to the hearing on that objection. The objection was not pursued further pursuant to the claims objection procedure set forth in the Modified Plan.</p>
50.	18228, 18490	Lear Corporation ("Lear") asserts that any chapter 5 avoidance action against Lear is prohibited by the automatic stay in Lear's bankruptcy case and that any pending action against Lear should be dismissed and removed from Exhibit 7.19 to the Modified Plan.	To the extent that there is a pending avoidance action, which is presently stayed by the provisions of the Chapter 11 Reorganization Order as Modified (Docket Nos. 91-18228, 18490), the Debtors will continue to resolve such avoidance claims through the normal course of the reorganization process in Lear's bankruptcy case. The Debtors will continue to dismiss any actions against Lear that are not properly brought as an abandonment of the Debtors' case.
51.	18223	SKF USA Inc. ("SKF") objects to Modified Plan to the extent that it seeks to limit the Debtor's cure obligations to amounts due as of the time notices were issued and various prior deadlines. SKF requests inclusion of language in the order confirming the Modified Plan stating (i) that nondebtor counterparties shall be entitled to payment in full on any executory contract obligation that has accrued, but is not in default, as of the moment such executory contract is assumed and assigned, (ii) whether the Debtors or the assignee of such contract is liable for such accrued obligations, and (iii) if the Debtors are liable for such obligations, that these obligations shall either be paid in the ordinary course of business or through administrative claims allowance process set forth in the Modified Plan.	This is not an objection to the Modified Plan. The Debtors agree that the procedures set forth in the Modified Plan for the cure of defaults under the contract are appropriate and that the cure procedures are appropriate for the conditions of the case. The Debtors will make cure payments after the Effective Date.

**PLEASE CAREFULLY REVIEW THIS OBJECTION AND THE ATTACHMENTS
HERETO TO DETERMINE WHETHER THIS OBJECTION
AFFECTS YOUR CLAIM(S)**

Harvey R. Miller
Stephen Karotkin
Joseph H. Smolinsky
WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007

Attorneys for Debtors
and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	:	
In re	:	Chapter 11 Case No.
	:	
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	:	09-50026 (REG)
f/k/a General Motors Corp., <i>et al.</i>	:	
	:	
Debtors.	:	(Jointly Administered)
	:	
-----X	:	

NOTICE OF DEBTORS' THIRD OMNIBUS OBJECTION TO CLAIMS
(Duplicate Claims)

PLEASE TAKE NOTICE that on December 8, 2009, Motors Liquidation Company (f/k/a General Motors Corporation) and its affiliated debtors, as debtors in possession (the "**Debtors**"), filed their third omnibus non-substantive objection to claims (the "**Debtors' Third Omnibus Objection to Claims**"), and that a hearing (the "**Hearing**") to consider the Debtors' Third Omnibus Objection to Claims will be held before the Honorable Robert E. Gerber, United States Bankruptcy Judge, in Room 621 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, on

Exhibit A

Motors L.L.C.

Case No. 09-50026 (REG), Jointly

05-44481-1 Filed 12/26/18 Entered 01/02/19 12:10:28 Main Document

CLAIMS TO BE DISALLOWED AND EXPUNGED

SURVIVING CLAIMS

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference	Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)
SANDRA AHIAUS IRA	3038	Motors Liquidation Company	\$0.00 (S)	Duplicate Claim	Pgs. 1-4	SANDRA AHIAUS IRA	3033	Motors Liquidation Company	\$0.00 (S)
SANDRA AHIAUS 10548 PENN AVE SO BLOOMINGTON, MN 55431			\$22,880.00 (P)			SANDRA AHIAUS 10548 PENN AVE SO BLOOMINGTON, MN 55431			\$0.00 (A)
Official Claim Date: 10/2/2009			\$22,880.00 (T)			Official Claim Date: 10/2/2009			\$22,880.00 (P)
SCHIOENL KEVIN M	7554	Motors Liquidation Company	\$0.00 (S)	Duplicate Claim	Pgs. 1-4	SCHIOENL KEVIN M	7553	Motors Liquidation Company	\$0.00 (U)
SCHIOENL, KEVIN M 16 WEST MAIN STREET 6TH FLOOR ROCHESTER, NY 14614			\$0.00 (A)			SCHIOENL, CONNIE CELLINO & BARNES PC 16 WEST MAIN STREET 6TH FLOOR ROCHESTER, NY 14614			\$22,880.00 (T)
Official Claim Date: 10/9/2009			\$0.00 (P)			Official Claim Date: 10/9/2009			\$0.00 (U)
SHARYL Y CARTER	552	Motors Liquidation Company	\$0.00 (S)	Duplicate Claim	Pgs. 1-4	SHARYL Y CARTER	136	Motors Liquidation Company	\$0.00 (S)
1541 LASALLE AVE, #1 NIAGRA FALLS, NY 14301			\$0.00 (A)			1541 LASALLE AVE, #1 NIAGRA FALLS, NY 14301			\$0.00 (S)
Official Claim Date: 6/19/2009			\$0.00 (P)			Official Claim Date: 6/18/2009			\$0.00 (A)
SHIPMAN & GOODWIN LLP	1207	Motors Liquidation Company	\$0.00 (S)	Duplicate Claim	Pgs. 1-4	SHIPMAN & GOODWIN LLP	1217	Motors Liquidation Company	\$0.00 (P)
TTN JULIE A MANNING ONE INSTITUTE PLAZA ARTFORD, CT 06103			\$0.00 (A)			JULIE A MANNING ONE CONSTITUTION PLAZA HARTFORD, CT 06103			\$0.00 (U)
Official Claim Date: 8/21/2009			\$13,906.18 (U)			Official Claim Date: 8/18/2009			\$13,906.18 (T)
			\$13,906.18 (T)						\$13,906.18 (U)

In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

HEARING DATE AND TIME: January 14, 2010 at 9:30 a.m. (Eastern Time)
 RESPONSE DEADLINE: January 7, 2010 at 4:00 p.m. (Eastern Time)

**PLEASE CAREFULLY REVIEW THIS OBJECTION AND THE ATTACHMENTS
 HERETO TO DETERMINE WHETHER THIS OBJECTION
 AFFECTS YOUR CLAIM(S)**

Harvey R. Miller
 Stephen Karotkin
 Joseph H. Smolinsky
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 Telephone: (212) 310-8000
 Facsimile: (212) 310-8007

Attorneys for Debtors
 and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
 SOUTHERN DISTRICT OF NEW YORK**

In re

**MOTORS LIQUIDATION COMPANY, et al.,
 f/k/a General Motors Corp., et al.**

Debtors.

Chapter 11 Case No.

09-50026 (REG)

(Jointly Administered)

NOTICE OF DEBTORS' THIRD OMNIBUS OBJECTION TO CLAIMS
(Duplicate Claims)

PLEASE TAKE NOTICE that on December 8, 2009, Motors Liquidation Company (f/k/a General Motors Corporation) and its affiliated debtors, as debtors in possession (the "**Debtors**"), filed their third omnibus non-substantive objection to claims (the "**Debtors' Third Omnibus Objection to Claims**"), and that a hearing (the "**Hearing**") to consider the Debtors' Third Omnibus Objection to Claims will be held before the Honorable Robert E. Gerber, United States Bankruptcy Judge, in Room 621 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, on